Public Comments and Responses
– Price Draft RMP/EIS –
July 2004
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General Comment Responses

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1	This plan does not take into consideration the needs of all public lands users. Whatever happened to the idea of multiple use? Too many or too few areas are closed for OHV use, camping, recreating and other public uses. All areas should be open for public use and enjoyment.	The Federal Land Policy and Management Act (FLPMA) requires RMPs to be "multiple-use plans". The term "multiple use" as defined in (FLPMA) 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 or at the same time. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that certain resource values such as wilderness characteristics and riparian areas are protected while allowing opportunities for motorized and non-motorized recreation, mineral exploration and development and other resource uses.
2	BLM has failed to meet the requirements of NEPA by not providing a reasonable range of alternatives.	CEQ regulations for the implementation of NEPA (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 identify a reasonable range alternatives that address the issues, concerns, and alternatives identified by the public. BLM began development of the range of alternatives early in the RMP process through internal and public scoping (January 2002) and coordination with cooperating agencies. Each alternative, except for the no-action alternative, represents an alternative means of satisfying the identified

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		purpose and need, and of resolving issues. In response to public comment and case law BLM analyzed a sixth alternative, Alternative E, in the Supplement to the Draft RMP/Draft EIS. Alternative E would manage the public lands administered by the Price Field Office with an emphasis on protection of non-WSA lands with wilderness characteristics. The Proposed RMP is a seventh alternative which incorporates changes to Alternative D which is identified as the preferred alternative in the Draft RMP/EIS. As stated by the Council on Environmental Quality (CEQ-40 Most Asked Questions, 46 Fed. Reg. 18026, March 23, 1981 as amended) when there are potentially a very large number of alternatives, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS. For the Final RMP BLM can choose management actions from within the range of the alternatives presented in the DRMP/EIS and can create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate. The term “multiple use” as defined in FLPMA means “the management of the public lands and their various resource values so that they are used in the combination that will best meet the present and future needs of the American people.” This direction indicates that not all uses need to be accommodated in all areas. The Draft and Final RMP/EISs include a detailed evaluation of a full range of alternatives to ensure that a balanced approach including protection of resource values and sensitive resources as well as opportunities for resource use and production is considered.
3	The Draft RMP/EIS does not provide specific actions to protect water quality and riparian/wetland areas.	Specific actions designed to protect and enhance riparian and wetland areas have been adopted and are stated in Chapter 2 of the Draft RMP/EIS and Proposed RMP/FEIS. As discussed in Section 2.16 of the Draft RMP/EIS and 2.3 of the Proposed RMP/Final EIS, under all alternatives BLM would manage uses to minimize and mitigate damage to soils, including critical soils and biological soil crusts; prevent excessive soil erosion, maintain or restore the chemical, physical, and biological integrity of the area’s waters; improve streams listed as water quality limited and prevent listing of additional streams under the Clean Water Act, Section 303(d);
4	The Draft RMP/EIS does not provide sufficient protection for endangered or sensitive species or does not provide enough protection for special status species.	Section 2.3 of the Proposed Plan/Final EIS lists the goals and objectives for management of Special Status Species.
5	The Draft RMP/EIS does not provide sufficient protection for sensitive plant species.	See GCR 4 regarding protection of special status species. BLM’s Standards for Rangeland Health provide the guidance for preparation of land use plans and are the basis for development of planning area-specific management objectives (Utah BLM Standard 3, “Desired species including native, threatened, endangered, and Special Status Species, are maintained at a level appropriate for the site and species involved”). This is specifically intended to provide healthy habitats for rare plants. Utah BLM Sensitive Species are protected to not cause undue harm or the need to list the species. “Avoidance” of surface disturbing activities is used to prevent any

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		destruction of the species unless no other feasible alternative is possible, and then the Authorized Officer may apply mitigation. Protection measures are also implanted in coordination with USFWS and UDWR from recovery plans and conservation agreements. BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. Detailed species-specific information will be included as part of the completed biological assessment, which will be incorporated by reference. Information contained in the affected environment (Chapter 3) and impact analysis (Chapter 4) is compatible with the conservation measures identified by the US Fish and Wildlife Service in response to the Biological Assessment. BLM has conducted the ESA Section 7 consultation process concurrently with preparation of the EIS. The Committed Conservation Measures and affect findings from the BA are provided in Appendix D, Proposed RMP/Final EIS. BLM will complete consultation with the USFWS before the ROD and Final RMP are issued. Additional mitigation requirements resulting from the Section 7 process will be included in the ROD and implemented at the project activity level.
6	The Draft RMP/EIS does not provide access for hunting and game retrieval. The BLM should not control wildlife populations. BLM must recognize and support the role of the Utah Division of Wildlife Resources (UDWR) in managing wildlife and fisheries populations and in regulating hunting and fishing.	BLM manages habitat rather than wildlife populations. Management of federally listed, proposed, or candidate species or suitable habitat for the same species is under the Jurisdiction of the USFWS. Hunting of upland wildlife populations including big game, small game and furbearers is under the jurisdiction of the Utah Division of Wildlife Resources (UWDR). USFWS and UDWR are responsible for determining game management goals and target populations. Long-term goals for habitat are defined by BLM through the Standards for Rangeland Health and Proper Functioning Conditions for streams, wetlands, and riparian. Section 2.3 of the Proposed RMP/Final EIS identifies BLM support for hunting as part of the goals and objectives for all alternatives. The impact of road closures on hunting access is identified in Section 4.3.3 of the Proposed RMP/Final EIS. Impacts of decisions on wildlife and habitats are analyzed in Section 4.2.8.
7	This plan does not provide for management of wildlife, special status species, or management for wildlife and special status species is too restrictive.	See GCR 4. 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. Committed mitigation measures developed in cooperation with FWS are detailed in Appendix D, Proposed RMP/Final EIS.
8	The BLM must be clear in regard to game management goals and management of game populations, especially with respect to how they affect range management, proper functioning condition. Some commented on the need for mitigation measures for impacts from wildlife management.	See GCR 6. Chapter 4 of the Proposed RMP/Final EIS analyzes the impacts of wildlife management on other resources and uses and Appendix G presents the exception, modification and waiver criteria that could be applied to mitigate the impacts of wildlife management on other resources and uses.
9	The Draft RMP/EIS does not adequately describe BLM's cultural resource protection procedures or adequately analyze the impacts of development on cultural and/or	BLM is consulting with the State Historic Preservation Officer per the National Historic Preservation Act relating to the management decisions in the Proposed RMP/Final EIS (see Appendix E). The alternatives provide appropriate and adequate protection and use of the various

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	historic resources.	resources in the planning area. When making land use plan decisions, BLM complies with all laws, policy, and regulation, which do not require all cultural resources to be preserved nor that all impacts on cultural resources be mitigated on a site-by-site basis. The cumulative impacts analysis has been revised to include more specific impacts on cultural resources.
10	Trails, OHV routes, transportation routes, and roads should be left open for access and continued enjoyment of public lands, such as the San Rafael Swell. Closures concentrate people rather than dispersing them, which affects remoteness and seclusion or more OHV/ORV restrictions are needed for the protection of WSAs and other resources and uses.	BLM has the authority to close routes that cause resource damage or no longer serve any purpose. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose are not being considered for designation. Potential conflicts between OHV and non-motorized uses have been taken into consideration in the route designation process. Cross country travel by motorized vehicles is not allowed under any of the proposed alternatives, except the No Action Alternative. No “open areas” have been identified in the Proposed RMP, but cross country OHV travel would be considered for areas under Recreation and Public Purposes Act (R&PP) leases adjacent to or near incorporated towns in previously disturbed areas. Recreational demands and opportunities as well as management of current trails have been carefully analyzed in this document and in the San Rafael Route Designation Plan. The Proposed RMP is designed to balance protection of natural resources and other resource uses while allowing for public access and transportation through the area. Travel management activity planning would include public involvement and analyze impacts at the site-specific level. Travel management planning is dynamic and is anticipated to change as resource demands and uses change. The Proposed RMP does not contemplate designating all existing routes. The BLM, with assistance of its cooperators (including Carbon and Emery Counties) has evaluated these routes against a standard set of criteria to consider resource impacts, safety considerations, landscape settings and recreational opportunities. These criteria include cultural resources, watershed, special status species, wildlife, and other uses. A travel management plan that would be prepared to implement the RMP would address signing and enforcement and could address changes in route designations if appropriate. The Draft RMP/EIS and Proposed RMP/Final EIS analyze a range of alternatives to assure that a balanced approach that allows BLM to protect the resources and resource users is considered. In addition, WSAs are being managed to preserve their wilderness values in accordance with BLM's Manual H-8550-1 titled “Interim Management Policy and Guidelines for Lands Under Wilderness Review” which allows vehicle use to continue on existing ways so long as wilderness values are not impaired. Further, with exception of Alternative E, none of the alternatives would change the San Rafael Motorized Route Designation plan of February 2003. The criteria developed in that plan have been applied to the remainder of the Price planning area.
11	RS 2477 assertions should or should not be recognized and resolved in the RMP. The RS 2477 language should be consistent throughout the RMP/EIS.	BLM does not have the authority to resolve RS 2477 right-of-way assertions in the Proposed RMP/FEIS. Such assertions can be settled administratively on a case-by-case basis or as confirmed through other legal means (see Chapter 1.6, Planning Criteria). The RS 2477 language in the Proposed RMP/Final EIS has been written to eliminate inconsistencies.
12	The network of user-created ORV routes in the Price district threatens to impair wilderness values. The RMP should	See GCR 10. BLM has the authority to close routes that cause resource damage or no longer serve a purpose. Under the Proposed RMP, redundant routes (multiple routes going to the same

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	minimize motorized use in the Price RMP planning area and provide clear and effective enforcement policies to prevent motorized intrusion into non-motorized travel areas. It should prohibit ORV use in wilderness study areas, BLM-inventoried wilderness lands, areas proposed for wilderness designation under the Redrock Wilderness Act, critical wildlife habitat, riparian areas, wetlands, and other fragile ecosystems. BLM should establish a balance between motorized and non-motorized travel; including an effective trail enforcement plan. The Castle Country Heritage Plan is a balanced approach.	place) or routes that appear to serve no purpose designation. Potential conflicts between motorized and non-motorized uses have been taken into consideration in the route designation process. Recreational demands and opportunities as well as management of current trails are analyzed in this Proposed RMP/Final EIS. The recreational motorized route designations in the Proposed RMP are designed to balance protection of natural resources and uses while allowing for public access and transportation through the area. BLM, with the assistance of its cooperators (including Carbon and Emery counties), has evaluated these routes against a standard set of criteria to consider resource impacts, safety considerations, landscape settings, and recreational opportunities. These criteria include cultural resources, watershed, Special Status Species, wildlife, and other uses. During activity level planning or as resource conditions warrant, route designations may be changed. Open areas will be considered on a case-by-case basis under the Recreation and Public Purposes Act (R&PP) for previously disturbed areas near communities. Several trail systems are being established for OHV use. Most routes designated for motorized use do not include vehicle type restrictions. Motorcycle routes include the Chimney Rock/Summerville Trail System, Temple Mountain Motorcycle Trails, and Waterfall Trail. Routes for vehicles 52 inches or less in width include portions of the Behind the Reef Route and portions of the Chimney Rock/Summerville Trail System. Also see GCRs 35, , and 144.
13	The EIS should analyze impacts to specific resources and uses such as the impact of dust on cultural resources and recreation in Nine Mile Canyon and the, disturbance of vegetation by oil and gas development, OHVs and other activities.	The analyses of impacts to specific resources and uses resulting from management of other resources and uses have been expanded between the Draft RMP/EIS and the Proposed RMP/Final EIS and are discussed in Chapter 4, Environmental Consequences. Specific comments are addressed on the Compact Disc that accompanies this Proposed RMP/Final EIS.
14	The preferred alternative should ensure that opportunities for non-motorized recreation would not be degraded by other resources uses such as OHV use and oil and gas development. The BLM should provide for non-motorized recreation and preservation so hikers do not have to listen to noise created by vehicles and mineral exploration and development.	See GCR 1. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure that a balanced approach that provides opportunities for non-motorized recreation while allowing appropriate levels of motorized recreation and mineral exploration and production is considered. Impacts on recreation from other resource management decisions and actions are addressed in Section 4.3.3 of the Proposed RMP/Final EIS.
15	OHV use and recreation in general would not be sufficiently regulated by the BLM under the preferred alternative.	See GCR 12. The DEIS evaluated a range of alternatives in detail to assure a balanced approach that allows opportunities for non-motorized and motorized recreational uses as well as resource extraction and use is considered. The management actions in the Proposed RMP are designed to offer management flexibility to ensure that resource values and uses are protected while providing a diversity of recreation opportunities for user groups and individuals. Some portions of the planning area would be closed to OHV use while in other areas use would be limited to designated roads and trails. Camping would also be regulated with respect to water locations and areas could be closed to camping if resource damage occurs. Special recreation use permits within the planning area would be issued only when consistent with plan objectives. Signing and law enforcement will be considered as part of a Travel Management Plan following completion of

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		the RMP.
16	BLM should or should not, require oil and gas companies to use directional drilling throughout the planning area.	Directional drilling is and under the Proposed RMP would be considered where possible. It is one of many mitigation measures that have been used successfully in the planning area. However, directional drilling is not possible for all wells given geology, topography and certain technical issues. The lessee (operator) in consultation with the BLM ultimately decides the method of drilling based on site specific conditions and the objectives for drilling. If conditions allow, BLM would require directional drilling after site-specific analysis for approval of APDs.
17	BLM should recognize valid existing rights and not impose additional restrictions upon valid and existing leases where operators currently comply with existing laws protecting water, air, cultural and other resources.	Valid existing must be recognized by BLM and do not require specific planning decisions 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 decisions 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.
18	The Draft RMP/EIS does not provide for an adequate level of oil and gas development and does not provide for an adequate balance with other resource uses.	See GCR 1. BLM's Land Use Planning Handbook, H-1601-1, requires consideration of many factors in the development of alternatives (i.e. meet the purpose and need for the action; meet the goals and objectives for the plan; can be feasibly carried out based on cost, logistics, technology, and social and environmental factors; represents a different land use plan that addresses and/or resolves the planning issues; decisions may be common to some or all of the alternatives; components of each individual alternative must be complementary; and developed in an open, collaborative manner to the extent possible). With cooperators assistance and public input, BLM has met the handbook requirements. The alternatives analyzed in detail would provide for a broad range of oil and gas leasing and subsequent development.
19	Designating virtually every identified existing route and trail as a motorized route is not a prudent approach to dealing with motorized recreation. Allow for a reasonable balance between motorized and non-motorized travel -Include an effective trail enforcement plan. -Completely prohibit all cross-country motorized travel. Designate and clearly sign motorized routes, but only where conflicts will other users or resource values do not exist. We need to keep all of it open to ATV's. This land belongs to everyone and it should be left open to multiple use. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. All of the popular OHV Trail Systems must remain open. The no action alternative shows that there are presently many large areas open to OHV use	See GCRs 1, 10, and 12. The DEIS evaluated a range of alternatives in detail to assure a balanced approach that allows opportunities for non-motorized and motorized recreational uses as well as resource extraction and use is considered. The management actions in the Proposed RMP are designed to offer management flexibility to ensure that resource values and uses are protected while providing a diversity of recreation opportunities for user groups and individuals. The outcome of the final RMP and ROD will be a network of routes designated for motorized use that will be mapped, signed, and enforced. This map will be published and made available for public display and use. The marking of trails on-the-ground and enforcement will be part of implementation planned to begin after the ROD; however, issues related to site-specific planning decisions are being deferred to activity level planning and implementation, which will be completed after the completion of this plan. The Proposed RMP does not contemplate designating all existing routes. The BLM, with assistance of its cooperators (including Carbon and Emery Counties), has evaluated these routes against a standard set of criteria to consider resource impacts, safety considerations, landscape settings and recreational opportunities. These

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	off designated trails. In none of the other alternatives are any of these open areas present. This is unacceptable and does not represent a full range of alternatives considering the present uses. This new management plan appears to close significant amounts of established roads and trails. Please do not leave out established OHV trails on the OHV Route Designation Maps.	criteria include cultural resources, watershed, special status species, wildlife, and other uses. BLM has the authority to close routes that cause resource damage or that are redundant (multiple routes going to the same place). Potential conflicts between OHV and non-motorized uses have been taken into consideration in the route designation process. No "Open Areas" have been identified. Cross-country travel by motorized vehicles will not be allowed in the proposed plan. A multiple use travel plan that would include designating hiking or horse routes is not part of this phase of planning but will come later at the activity planning level. With the exception of Alternative E, all alternatives would carry routes covered by the San Rafael Motorized Route Designation plan of February 2003 forward into the RMP without modification.
20	Alternatives do not state what will be closed and what will be open to OHV use. The maps are inadequate, incorrect, or difficult to read; specifically the Summerville/Chimney Rock and Humbug trail system, and Arapeen connector routes are not shown. Route information provided during scoping was not presented on the maps.	The Summerville/Chimney Rock Trail System, which was mentioned in the text of the Draft RMP, but inadvertently left off the preferred alternative map, are included in the proposed plan and map. Routes covered by the San Rafael Motorized Route Designation Plan (SRMRDP) of February 2003 were not shown on the DEIS maps. Additional review, in coordination with cooperating agencies, was given that resulted in the proposed route network. Additional reviews will occur as activity level planning is conducted. Route designations are shown on Maps 2-71 through 2-74 and Map 2-68 in the Proposed RMP/Final EIS.
21	The BLM should continue to provide for the "casual use" of backcountry airstrips.	In 43 CFR 2800, casual use is defined as: "…activities ordinarily resulting in no or negligible disturbance of the public lands, resources, or improvements (e.g., surveying, marking routes, and collecting data to use to prepare grant applications)." The BLM recognizes that small aircraft, responsibly handled, cause minimal if any impacts to the resources or public lands in general, but it is not appropriate to try to list all of the uses that would fall under this definition. The Proposed RMP would not close any airstrip. Any future closure of existing backcountry airstrips would be done only on a case-by-case basis and would adhere to Section 345 of Public Law 106-914, which states that the Department of Interior cannot permanently close aircraft landing strips, officially recognized by State or Federal aviation officials, without public notice, consultation with cognizant State and Federal aviation officials and the consent of the Federal Aviation Administration. Landing strips damaging soil and water resources or impeding agency compliance with existing laws and/or regulations may be closed following appropriate public notice, consultation and consent. Short-term closures are not affected by this provision. With regard to other airstrips mentioned in the comments, the following information is from the Utah Back Country Pilots Association website.
22	The Draft RMP/EIS does not adequately protect Wilderness Study Areas (WSAs) or management of WSAs is too restrictive.	As described in Chapter 1, Section 1.6 of the Draft RMP/DEIS under the title "Planning Issues" WSAs are managed in accordance with the Interim Management Policy for Lands Under Wilderness Review (IMP, H-8550-1; BLM 1995). The WSAs are statutorily required, pursuant to FLPMA Section 603(c), to be managed to protect their suitability for Congressional designation. Applying a visual resource management objective of Class I and managing the WSA as either limited to designated ways or closed to OHVs are the only two decisions that this land use planning effort has authority to make. All other decisions for the management of WSAs are outside the scope of this RMP/EIS process.

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23	The Draft RMP/EIS should incorporate an invasive weed management program.	Under Section 2.7.3.1 of the Draft RMP/EIS and 2.3 of the Proposed RMP/Final EIS, Noxious/Invasive Weed Management, BLM would "work with Carbon and Emery counties to prevent the introduction or spread of noxious weeds and invasive species by applying mitigation measures, including monitoring and treatment." Control of noxious weeds and the use of certified weed-free hay in grazing practices is addressed under Guideline 9 of the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah and in Appendix 10 of the Draft RMP/EIS. Section 2.5.1 refers to access for the general public, whereas noxious and invasive plant prevention and control can be completed with administrative access including areas that the general public cannot access with motorized vehicles. The wording in Section 2.7.3.1 and 2.3 does not restrict management of invasive species not listed on state and county noxious and invasive weed lists, but uses these official lists as examples. The details associated with the cooperative agreements under this section will be discussed between BLM and each agency, which can include invasive species and disease organisms not on the official lists, if each party to the agreement deems the measures feasible and appropriate.
24	The Draft RMP/EIS should incorporate noxious weed management.	See GCR 24. Under Section 2.7.3.1 of the Draft RMP/EIS and 2.3 of the Proposed RMP/Final EIS, Noxious/Invasive Weed Management, in BLM would "work with Carbon and Emery counties to prevent the introduction or spread of noxious weeds and invasive species by applying mitigation measures, including monitoring and treatment." Control of noxious weeds and the use of certified weed-free hay in grazing practices are addressed under Guideline 9 of the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah and in Appendix 10 of the Draft RMP/EIS. Section 2.5.1 refers to access for the general public, whereas noxious and invasive plant prevention and control can be completed with administrative access including areas that the general public cannot access with motorized vehicles. The wording in Section 2.7.3.1 and 2.3 does not restrict management of invasive species not listed on state and county noxious and invasive weed lists, but uses these official lists as examples. The details associated with the cooperative agreements under this section will be discussed between BLM and each agency, which can include invasive species and disease organisms not on the official lists, if each party to the agreement deems the measures feasible and appropriate.
25	The Draft RMP/EIS needs to clearly identify and explain the suitability evaluations for each Wild and Scenic River segment.	The WSR Study Process, including suitability considerations for each eligible stream, is explained in detail in Appendix C of the Proposed RMP/Final EIS and has been revised since the Draft RMP/EIS.
26	The BLM does not have the authority to perform interim protective management of proposed Wild and Scenic River segments that are not yet approved by Congress.	FLPMA gives BLM broad authority to manage the public lands, including management of eligible and suitable river segments. For eligible rivers, BLM's policy is to protect certain values identified in the eligibility determination process to ensure that a decision on suitability can be made. To accomplish this objective, BLM must manage to protect the free-flowing character, tentative classifications, and identified outstandingly remarkable values of eligible rivers according to the prescriptions and directions of the current, applicable land use plan per BLM Manual Section 8351.32C which states that BLM managers shall: "Manage any eligible or designated WSR so as to protect and enhance (if possible) and not degrade any identified outstandingly remarkable river

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		values." Therefore, BLM is obligated to avoid or otherwise mitigate any adverse affects to these values in the interim until Congress has an opportunity to act on potential designations. The BLM Manual further states that should a determination on suitability not be made during the planning process, "the RMP must prescribe protective management measures to ensure protection shall be afforded the river and adjacent public land area pending the suitability determination" (Section 8351.33A).
27	The BLM eligibility determination excluded some river segments that should have been found eligible.	The BLM PFO used the 1997 publication A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council during the evaluation of rivers potentially eligible to become congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various streams that BLM identified as eligible. In some cases, however, an interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. In these cases, a rationale is provided in Table C-3 of Appendix C in the Proposed RMP/Final EIS.
28	BLM's Wild and Scenic River tentative classification determinations are not accurate.	The tentative classifications established through inventory for an eligible river are considered in at least one alternative. However, because a river's tentative classification provides a framework for the management prescriptions applied within the river area, some flexibility is allowed to consider a range of tentative classifications in the alternatives. BLM's Wild and Scenic River Manual (Section 8351.33C.) states, "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include resolution of conflicts with other management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations. Regarding protection of the San Rafael River's outstandingly remarkable scenic value, the majority of the river area, including that portion adjacent to the Wedge, is VRM Class I the Proposed RMP.
29	The Price RMP must be consistent with State and Local Plans.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM has identified planning conflicts in the Proposed RMP/Final EIS, so that the State and local governments may have a complete understanding of the impacts of the Proposed RMP on State and local

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		management options. A consistency review of the Proposed RMP with the State and County Master Plans is included in Chapter 5.
30	The Draft RMP/EIS fails to comply with laws that require BLM to protect lands that contain significant cultural, geologic, scenic, recreational, and plant and wildlife habitat as ACECs.	In compliance with 43 USC 1712(c) 2 and 1702(a), the BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-11 and 12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives and the ACEC supplement June 2006. A summary of these ACECs is located in Appendix L of the Proposed RMP/Final EIS. Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS or Proposed RMP/Final EIS alternatives. The BLM identified special management for potential ACECs, as directed by BLM Manual 1613-1 section 12, to protect and prevent irreparable damage to the relevant and important values. The different relevant and important values in the various potential ACECs require specific management decisions to address the various threats. The management decisions in each ACEC were designed to protect the relevant and important values. The impact to relevant and important values from identified management associated with each ACEC is noted in Chapter 4 of the Proposed RMP/Final EIS.
31	Would the Chimney Rock/Summerville/Humbug Trail system remain open under Alternative D? It was not shown on the maps.	While the Chimney Rock/Summerville/Humbug Trail system was shown on Map 2-54 it was inadvertently left out of the Preferred Alternative Map 2-56 of the Draft RMP/EIS. The Proposed RMP/Final EIS includes the Chimney Rock/Summerville/Humbug Trail system in all appropriate alternatives. There are approximately 670 miles of designated routes from the San Rafael motorized route designated of 2003. The Price River area has approximately 606 miles of routes designated. The designated routes in the Proposed RMP include routes for full sized vehicles, OHV's and Motorcycles. Designated routes linked to the Arapeen Trail System that were not in the Draft RMP/EIS have been added to Proposed RMP. Also GCR 20.
32	The maps in the Draft RMP/EIS are not accurate and are too small to be of any use.	Map content in the RMP has been completed from BLM standard datasets and presented with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The text of the Proposed RMP/Final EIS provides clarification of maps and specific comments were reviewed for each map to determine whether changes should be made. The 8 1/2" by 11" format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review, however more detailed information can be obtained from BLM data sets and shape files.
33	The BLM must manage livestock according to law. BLM must protect areas from livestock and keep livestock from sensitive areas.	Livestock grazing is a valid use of the public lands and provides for sustained grazing use through management decisions in compliance with law, regulation and policy. This includes designating which public lands are and are not available for livestock grazing, pursuant to 43 CFR 4130.2(a). The Proposed RMP addresses the permitted use on those allotments that are available for livestock grazing per BLM handbook 1601, Appendix C, page 14. In compliance with laws, regulation and policy, grazing permits are subject to review and evaluation before the permits are renewed. If necessary to maintain rangeland health, adjustments are made to the level of grazing

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		use based on monitoring data and sound best science methods. In additional, annual adjustments are made to the grazing use based on current range conditions and forage production amounts, including adjustments during periods of range depletion due to "severe drought or other natural causes" (43 USC 315b). Monitoring data is systematically collected to determine if a statistically significant change of the resources has occurred. The data is collected and evaluated using best science methods to make any necessary changes in management practices or authorized livestock forage level. Regular monitoring and adjustments be done as necessary to ensure that healthy sustainable rangeland ecosystems are maintained.
34	Motor boats should not be excluded on the Green River through Desolation Canyon.	The alternatives in the Proposed RMP/Final EIS would maintain existing management regarding the use of motors, particularly two stroke motors, on Desolation Canyon. The issue of motor use can most appropriately be dealt with at the activity plan level and BLM will defer a decision on this issue to activity planning. In that venue, the BLM can look at additional alternatives such as allowing motors with limitations on noise and visible exhaust plumes. This will also provide an opportunity for more effective dialogue with affected users.
35	The BLM should adopt the Castle Country Heritage Plan for management of wilderness and OHVs.	See GCR 12. A brief discussion of how the Castle Country Heritage Plan was considered in the planning process can be found in Chapter 2 of the Proposed RMP/Final EIS, Alternatives and Management Options Considered but Eliminated from Detailed Analysis.
36	The BLM should manage all areas within the Redrock Wilderness Bill as WSAs.	The BLM released the Supplement to the PFO Draft RMP/EIS for Non-WSA Lands with wilderness characteristics in September 2007. This supplement evaluated all lands nominated as having wilderness characteristics (including all lands within the Redrock Wilderness Bill) and analyzed Alternative E which would protect these areas. WSAs will be managed according the wilderness IMP until Congress either designates them as wilderness or releases them for uses other than wilderness.
37	Proper BLM management can be accomplished without layering levels of restrictions.	"Layering" is planning tool. Under FLPMA's multiple-use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a personal interest or desire to see that public lands are managed in a particular manner. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resource values and uses are considered to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not optional for BLM, but is

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		required by the FLPMA and National BLM planning and program specific regulations.
38	The Draft RMP/EIS should have addressed management of valid existing ROWs. The RMP/EIS should not preclude the potential for energy development, future ROWs and utility corridors.	BLM recognizes valid existing ROWs. The PFO obtained an updated transmission line file in March 2005. Utility corridors in all alternatives have been updated to include the lower voltage lines and the improved power line locations. All existing utilities in the PFO have not been added to the Utility Corridors Map. In the case of Nine Mile Canyon, proposed alternative routes have been included in the Utility Corridor map.
39	The Draft RMP/EIS must be consistent with county plans related to RS 2477.	The Proposed RMP/Final EIS does not address RS 2477 ROW assertions. Such assertions will be settled administratively on a case-by-case basis or as confirmed through other legal means. See Chapter 1.6, Planning Criteria. See GCR 11.
40	Mitigation measures for protection of wildlife are not adequate.	The Proposed RMP/Final EIS outlines general mitigation measures for wildlife habitat. Specific mitigation measures are also built into each management alternative (e.g., seasonal restrictions on big game crucial habitat) in order to ensure continued viability of wildlife species and habitat (see Appendix G of the Proposed RMP/Final EIS). Project level decisions would require additional site specific consultation and/or coordination and specific mitigation measures.
41	Appendix 8 and 16 are confusing and contradictory.	The Appendix 8 and 16 of the Draft RMP/EIS are combined into Appendix G in the Proposed RMP/Final EIS to eliminate any contradictions. Appendix G also includes criteria for exceptions, waivers and modifications.
42	The application of seasonal closures to oil/gas leasing is inconsistent and confusing.	Species-specific seasonal closures including exceptions, waivers, and modifications are included in Appendix G and would apply to all surface disturbing activities. Seasonal stipulations would not apply to valid existing oil and gas leases, maintenance, and servicing activities unless the stipulations are a part of the lease. Project level decisions would require additional and site-specific consultation and coordination and mitigation measures.
43	Mitigation measures that BLM proposes to protect wildlife should be based on sound science.	Mitigation measures for wildlife are generally based on the expertise of wildlife specialists at BLM, Universities and wildlife agencies such as the Utah Division of Wildlife and the U.S. Fish and Wildlife Service. Mitigation is generally based on the results of monitoring and studies. Future monitoring would help to confirm or refute the effectiveness of mitigation measures. BLM IM No. 2005-069 discusses compensatory mitigation. When offsite mitigation is considered a design feature of the applicant's submission, BLM NEPA analysis would (1) evaluate the need for offsite mitigation; (2) consider the effectiveness of offsite mitigation in reducing, resolving, or eliminating impacts of the proposed project(s); and (3) comparatively analyze the proposal with and without the offsite mitigation. When applying offsite mitigation, it would be implemented in a timely manner and generally for the same or similarly affected species or habitats (e.g., sagebrush/grassland for sagebrush/grassland).
44	The application of seasonal closures to oil/gas leasing is inconsistent and confusing.	Species-specific seasonal closures including exceptions, waivers, and modifications are included in Appendix G and apply to all surface disturbing activities. Seasonal stipulations would not apply to valid existing oil and gas leases, maintenance, and servicing activities unless the stipulations are a part of the lease. Project level decisions would require additional and site-specific analysis, mitigations and consultation and coordination.

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45	More or less oil and gas exploration is needed. Stipulations should be relaxed to allow more oil and gas exploration or should be more restrictive to protect other resources.	The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities for mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of mineral and energy development.
46	The BLM cannot turn over management of the public lands to cooperating agencies.	Section 1.10 of the Draft RMP/EIS stated,"…where it is found mutually advantageous, BLM would enter into cooperative agreements or memorandums of understanding with federal, state, local, tribal, and private entities to manage lands or programs consistent with the goals and objectives of this RMP." This wording does not indicate that management of public lands would be relinquished or turned over to other entities, but indicates that BLM would cooperate with these entities in the management of the public lands. The authority to enter into such agreements is Section 307(b) of the Federal Land Policy and Management Act (FLPMA) which state that "Subject to the provisions of applicable law, the Secretary may enter into contracts and cooperative agreements involving the management, protection, development, and sale of public lands."
47	The Animal Damage Control MOUs between BLM and APHIS should not be modified through this land use plan.	The BLM agrees with USDA-APHIS/Wildlife Services that the existing Master Memorandum of Understanding between APHIS and BLM at the national level, signed on March 21, 1995, as well as the statewide MOU signed in July 1996, authorize APHIS/WS to conduct animal damage control activities on public lands in Utah, pursuant to guidelines and policies agreed to in the aforementioned MOU's. Because no addendum to the statewide MOU is anticipated relative to conducting predator control activities within the Price Field Office planning area, and because predator control activities were not identified as a scoping issue for the RMP revision, predator control decisions from the previous land use plans should have been carried forward under the "Actions Common to All Alternatives" section of the Draft RMP/EIS. The Proposed RMP/Final EIS does not provide a range of alternatives for predator control, but defers to the existing national and statewide MOU's as revised, for direction in carrying out this program.
48	The Reasonably Foreseeable Development Scenario (RFD) limits the number of wells that BLM can authorize without amending the RMP.	The BLM has revised the Reasonably Foreseeable Development (RFD) scenario based upon public comment. The revised RFD is Appendix M of the Proposed RMP/Final EIS. The RFD scenario is an analytical model, which estimates oil and gas activity that could potentially occur. The RFD scenario is a reasonable technical and scientific approximation of anticipated oil and gas activity based on the best available information, including the potential for oil and gas resource occurrence, past and present oil and gas activity in conjunction with other significant factors such as economics, technology, and physical limitations on access, existing or anticipated infrastructure, and transportation.
49	The Price RMP/DEIS does not adequately address the laws of mineral development nor does it adequately support restrictions on mineral development.	BLM has supplemented Chapter 4 to improve the Energy Policy and Conservation Act of 2005 (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. Stipulations for Surface Disturbing Activities).

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		Concerns regarding number of wells, compliance with IM 2004-089, mineral potential occurrence map, use of USGS data in the Mineral Potential Report, and reclamation as a mitigation measure are discussed in the Appendix M of the Proposed RMP/Final EIS.
50	The ROS inventory is flawed. The SRMA management goals and objectives aren't well defined and activity plans have not been prepared. Additional designations such as “high-use areas” and ACECs overlap and provide different and sometimes inconsistent management.	The ROS inventory was updated and corrected as a result of public comment and meetings with cooperators (Carbon and Emery Counties). Mapping errors have also been corrected. The text of the document has also been revised to remove the term, “High Use Zone,” and replace it with the more correct, “Recreation Management Zone.” SRMA goals are defined in the Proposed RMP and activity plans exist for all SRMAs with the exception of the San Rafael.
51	The BLM did not use the correct data when developing the mineral potential report and the RFD.	The RFD has been revised based on public comment. Concerns regarding compliance with IM 2004-89 are discussed in the revised RFD, Appendix M.
52	BLM has not effectively met the requirements of the Energy Policy and Conservation Act (EPCA) in developing the RFD.	BLM has supplemented Chapter 4 to improve the EPCA analysis by addressing the impacts from leasing restrictions and to address the potential loss of oil and gas production due to these restrictions. In addition, the analysis includes the impacts of restrictions on the drilling season. The restrictions of the RMP will become stipulations for future leasing (see Appendix G. Stipulations for Surface Disturbing Activities). Concerns regarding number of wells, compliance with IM 2004-089, mineral potential occurrence maps, use of USGS data in the Mineral Potential Report, and reclamation as a mitigation measure are discussed in the revised RFD, Appendix M.
53	The BLM has failed to develop and use an accurate RFD in the Price RMP/DEIS.	The RFD has been revised based on public comment and concerns regarding compliance with IM 2004-89. The RFD for the Proposed RMP/Final EIS is presented in Appendix M.
54	The impact analysis in the Price RMP/EIS does not explain how mitigation measures help BLM meet their multiple use mandate and protect resources.	BLM requires onsite mitigation of impacts using best management practices. The analysis in Chapter 4 of the Proposed RMP/Final EIS is based on the assumption that the mitigation would be applied, therefore, the effectiveness of the mitigation is considered in the analysis.
55	The Draft RMP/EIS does not provide for sufficient management and protection of the greater sage grouse.	Several documents were published relative to greater sage-grouse and their habitat, after the Draft RMP/EIS was released for public comment. In June 2004, the Western Association of Fish and Wildlife Agencies (WAFWA) released the Conservation Assessment of Greater Sage-grouse and Sagebrush. The Proposed RMP/Final EIS complies with the greater sage-grouse and sagebrush habitat strategies, and applies suggested conservation measures to reduce the threats to not only greater sage-grouse populations and their habitats, but also to other sagebrush obligate species. In addition, the Proposed RMP includes goals, objectives and actions that would maintain or enhance the quality of existing sagebrush habitat, and provide for rehabilitation or restoration of degraded or historic sagebrush rangelands. See the Wildlife section of Chapter 2 in the Proposed RMP/Final EIS.
56	This plan does not take into consideration the needs of all public lands users. Whatever happened to the idea of multiple use?	See GCR 1. The Federal Land Policy and Management Act (FLPMA) requires RMPs to be “multiple-use plans”. The term “multiple use” as defined in (FLPMA) 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 or at the same time. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed

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		RMP are designed to ensure that certain resource values such as wilderness characteristics and riparian areas are protected while allowing opportunities for motorized and non-motorized recreation, mineral exploration and development and other resource uses.
57	The Fish and Wildlife Section is poorly written.	The Proposed RMP/Final EIS was edited to clarify and improve the usability of the document.
58	The Special Status Species Section is poorly written.	The Proposed RMP/Final EIS was edited to clarify and improve the usability of the document.
59	The BLM needs to provide for additional protection of raptors.	Appendix F of the Proposed RMP/Final EIS presents the August 2006 version of the Raptor Guidelines.
60	The BLM needs to apply the current raptor guidelines.	Appendix F of the Proposed RMP/Final EIS presents the August 2006 version of the Raptor Guidelines.
61	The Draft RMP/EIS needs to clarify what the sensitive species list is and how it is used.	The Proposed RMP/Final EIS Chapter 3 has been revised to explain why BLM uses The State Director's Sensitive Species List.
62	The Draft RMP/EIS does not provide adequate information on special status species for the USFWS to conduct Section 7 consultation.	Chapter 3 contains a discussion of each of the listed and non-listed plant and animal species that occur within the Price planning area. The USFWS has accepted the Biological Assessment (BA) for the Price RMP and will prepare a Biological Opinion based on the BA. The RMP is a broad-scale planning document and the information contained within the affected environment and impact analysis of the EIS is of comparable scale. Additional detailed information on specific species will be developed at the site specific project stage. BLM will conduct additional Section 7 consultation on specific projects as they are reviewed. Any additional conservation measures resulting from the Section 7 process will be included as a part of the committed mitigation for these projects. Appendix D of the Proposed RMP/Final EIS presents the conservation measures that BLM would apply to protect special status species.
63	The Draft RMP/EIS should have provided site specific information on the location of Special Status Species and their habitats.	General Maps of wildlife and fisheries habitats may be provided to the public for review and information. However, threatened or endangered plant species locations and habitats would not be provided to the public due to threats to plant populations through collection. Likewise, information regarding specific locations of sage-grouse leks or exact raptor nest locations may not be provided to the public.
64	The Draft RMP/EIS did not demonstrate any coordination between BLM and the USFWS on Recovery Plans.	Actions involving listed threatened and endangered species including implementation of recovery plans, conservation measures are discussed in Chapter 2 of the EIS. As part of the EIS development process, Section 7 consultation with FWS is underway. The BLM Committed Conservation Measures (Chapter 5 of the BA) are presented in Appendix D, Proposed RMP/Final EIS. BLM will incorporate final conservation measures into the ROD as committed mitigation for the RMP. Conservation plans for non-listed special status species also contain conservation measures. These will be implemented on individual projects as determined necessary.
65	The Draft RMP/EIS should include site specific management plans to protect Special Status Species.	The RMP is a broad based planning document that addresses general management objectives for listed and special status plants and animals. The RMP is not the avenue to address development and implementation of site-specific resource needs for these species. As future activity plans and proposed projects are undertaken the most recent recovery and conservation plans as well as site-specific data and "best science" will be incorporated into management

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		practices for special status species.
66	The Animal Damage Control MOUs between BLM and APHIS should not be modified through this land use plan.	See GCR 50. The BLM agrees with USDA-APHIS/Wildlife Services that the existing Master Memorandum of Understanding between APHIS and BLM at the national level, signed on March 21, 1995, as well as the statewide MOU signed in July 1996, authorizes APHIS/WS to conduct animal damage control activities on public lands in Utah, pursuant to guidelines and policies agreed to in the aforementioned MOU's will not be modified through the RMP revision process.
67	The Draft RMP/EIS does not provide for adequate protection of riparian areas and water resources.	Water resources would be protected by maintaining or restoring overall watershed health and reducing erosion, stream sedimentation and salinization. Water resources would also be protected in community watersheds and sources of culinary water. Decisions in the Proposed RMP/Final EIS concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition. See Table 2-2 in the Proposed RMP/Final EIS for a description of the actions that would be taken to protect water resources and riparian areas and Section 4.2.2 for the analysis of potential impacts to water resources and riparian areas.
68	The 660 foot buffer zone around springs is excessive.	BLM has authority to require a 660 foot buffer zone of no surface disturbance or occupancy around springs. The criteria is further outlined and described in the following laws and executive orders: 1. Taylor Grazing Act of 1934, as amended, 49 USC 315: Stat.1269 (1970)a. authorizes the Secretary to continue the study of erosion and flood control and to perform such work as may be necessary to amply protect and rehabilitate such areas. 2. Federal Land Policy and Management Act (FLPMA) of 1976 (43 USC 1701 et seq.; 90 Stat. 2743; P.L. 94-579) a. requires that the public lands be managed in a manner that will protect the quality of ecological, environmental water resources, and that, where appropriate, will preserve and protect certain public lands in their natural conditions; that will provide food and habitat for fish and wildlife and domestic animals. b. Requires the compliance with State and Federal water pollution standards. 3. Water Quality Act of 1987, as amended form the Federal Water Pollution Control Act (Clean Water Act) of 1977 (33 USC 1251 et seq.; 91 Stat. 1566-1611; P.L. 95-217) a. The objective of this act is to restore and maintain the chemical, physical, and biological integrity of the Nation's water at a level of quality which provides protection for fish, shellfish, wildlife, and recreational use. b. Requires permits for certain activities in navigable waters. c. Requires States to assess their rivers, streams, and lakes and to develop nonpoint source management programs to control and reduce specific nonpoint sources of pollution. Requires Federal agency consistency with state management programs. 7. Emergency Wetlands Resources Act of 1986 (16 USC 3901). a. This act promotes the conservation of wetlands in the United States by intensifying cooperative efforts between public and private sectors to protect the wetland resource of the Nation through land acquisition, easements, and other methods. 8. Executive Order 11988 of 1977 (Floodplain Management as amended by Executive Order 12148). Each Federal agency is to take action to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains. Agencies are further required to avoid direct or indirect support of floodplain development whenever there is a practicable alternative. Each agency shall

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		provide leadership and shall take action to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities for acquiring, managing and disposing of Federal lands and facilities. 9. Executive Order 11990, may 24, 1977 (Protection of Wetlands). This EO directs Federal agencies to take action to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial value of wetlands in carrying out programs affecting land use. All federally initiated, financed, or permitted construction projects in wetlands must include all practical measures to minimize adverse impacts. This requires that all leases, rights-of- ways, easements, and disposals involving Federal wetlands must contain restrictions to uses by the grantees which are consistent with Federal, State, and local wetland regulations.
69	How does livestock grazing, or human activity affect water quality.	Any large or pervasive disturbance in a riparian zone will affect water quality regardless of whether the disturbance was caused by humans, fire, grazing, or any other cause. The impact of grazing on the environment is documented relating to specific areas within the PFO. Properly managed livestock grazing areas do meet the Rangeland Health Standards and Guidelines. Several factors are used to determine proper management of an area including season of use, kind of livestock, livestock numbers, watering locations, other resource uses, and manageability of the livestock, terrain, and remoteness.
70	The BLM should not provide buffer zones around natural springs, intermittent streams, and riparian areas.	BLM policy recognizes the importance of riparian/wetland values. Riparian/wetland management developed in RMPs and activity plans should initiate management to maintain, restore, improve or expand riparian/wetlands. The purpose of the buffer zone is to maintain, restore, improve or expand the existing riparian wetlands. The current BLM policy would be followed when determining exceptions to the restriction. Intermittent streams usually contain riparian obligate species due to the persistence of water in the drainage.
71	The coal occurrence potential map was not included in the Draft RMP/EIS.	Coal occurrence is shown on Map 3-25 of the Proposed RMP/Final EIS.
72	The soil, water and riparian impacts need to be clarified.	The Proposed RMP/Final EIS has been written and edited to clarify the impacts. See Section 4.2.2 of the Proposed RMP/Final EIS.
73	The Draft RMP/EIS failed to analyze the impacts from wild and scenic river designation on water volume in rivers and streams, water flows, and human consumption.	Water quality and water rights are the purview of the State of Utah. The BLM has worked with all co-operators to ensure that any effects of decisions regarding Wild and Scenic Rivers are considered. Barring congressional action, there is no effect on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect 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 doesn't require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through state processes. Thus, for congressionally

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		designated rivers, BLM may assert a federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. The BLM works to maintain healthy vegetation and soil conditions, which in turn help in the retention and filtering of water resources. The uses of the water are made possible by the delivery of clean water. Protection of rivers and streams would maintain water quality and the value of the water for its designated use.
74	How will BLM protect water quality and riparian resources in sensitive areas?	Appendix 20 of the Draft RMP/EIS addressed the issues of surface occupancy concerning wetlands, floodplains, and riparian areas, which are generally protected by EPA regulations and administered by the U.S. Army Corps of Engineers through Section 404 permitting under the Clean Water Act and further protected by Executive Orders 11990 and 11988 and BLM policies to preserve and protect wetlands. Under all alternatives, most lands along the Green River would be closed to leasing. The areas not closed are NSO or subject to major constraints. These restrictions cover a much larger area than the withdrawal from hard rock mining. VRM and classifications would overlay the entire river corridor under all alternatives. The Desolation Canyon National Historic Landmark provides a one-mile buffer for the river.
75	The mineral and energy information is not accurate and needs to be updated.	Information in the Proposed RMP/Final EIS has been updated and reviewed for accuracy. The RFD scenario has also been revised. See Sections 3.3.5, 4.3.5, Appendix M and Maps 3-18 through 3-27 of the Proposed RMP/Final EIS.
76	The Draft RMP/EIS did not analyze the impact to water quality, supply and pollution for interstate water resources.	The Clean Water Act was enacted to provide a blueprint for restoring and protecting the nation's precious water resources. The act has been amended to use the watershed as a means to further ensure the future cleanliness of those waters. State and federal law (specifically the Clean Water Act as administered in Utah by the Division of Water Quality and 43 CFR 4180 which addresses watershed and rangeland health) protects water quality within the State of Utah and the waters leaving the State. Further, the Bureau of Reclamation is working with the U.S. Department of Agriculture and the BLM in the Colorado River Basin Salinity Control Program to build many salinity control projects on the Colorado River and its tributaries. The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, reducing erosion, stream sedimentation and salinization. The programs' overall goal is to reduce the amount of salinity in the river water. Water resources would also be protected in community watershed and sources of culinary water. Decisions in the RMP concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition. The Price Field Office uses standard operating procedures and best management practices to prevent unwanted pollutants from escaping project areas. These laws and programs among others are intended to enhance and protect our nation's waters and the resources that depend on those waters.

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77	The coal report (Appendix 25) contains errors and needs to be updated.	The coal report in the Draft RMP/EIS has not been included in its entirety the Proposed RMP/Final EIS. However, pertinent information from the coal report has been updated and incorporated into the Proposed RMP/Final EIS.
78	Too many OHV routes or not enough OHV routes are open to unlicensed vehicles.	Currently only State roads are restricted to licensed vehicles. Additional reviews will occur as activity level planning is conducted. Maps 2-71 through 2-74 and Map 2-68 of the Proposed RMP/Final EIS show the route designations for the alternatives analyzed in detail. No further restrictions on the use of unlicensed vehicles are included in the Proposed RMP. Any additional restrictions on use of unlicensed vehicles would be initiated on an as-needed basis and would be made through activity level planning following completion of the RMP.
79	The Draft RMP/EIS route designation should address vehicle class (i.e. singletrack, ATV 52", or full-sized).	Several trail systems are being established for OHV use. Some are motorcycle only such as routes in the Chimney Rock/Summerville Trail System, the Temple Mountain Motorcycle Trails, and the Waterfall Trail. Some routes are for vehicles 52" or less in width such as portions of the Behind the Reef Route and some of the Chimney Rock/Summerville Trail System. However, BLM would not specify vehicle type for most routes that are designated open for motorized use. Vehicle class along with enforcement, signing etc. will be addressed in a Travel Management Plan that will be prepared following completion of the RMP.
80	More areas should be open to cross county OHV use to provide access to public lands for the aged and the disabled.	The Americans with Disabilities Act (ADA) accessibility guidelines do not specify or quantify the type or degree of access that must be allowed on public lands. The ADA does not require that all public land areas be vehicle accessible. ADA accessibility guidelines will be used in construction of any federal facilities on public lands. Designation of recreational motorized routes is an administrative decision and is not subject to ADA.
81	The BLM must provide a rationale for limits on group size, dispersed camping, and OHV access.	The requirements for organized group special recreation permits (SRPs) have been changed in the Proposed RMP. All organized groups of more than 14 people within a WSA and 24 in all other locations would be required to contact BLM. It is anticipated that most family gatherings could be accommodated without an SRP. Contact by an organized group and BLM's determination that a permit is not required would be documented in a Letter of Agreement. The criteria BLM would use to determine if such groups need an SRP is provided in Appendix I of the Proposed RMP/Final EIS, Criteria for Large Group Area Designation.
82	BLM has violated the Taylor Grazing Act by proposing voluntary relinquishments.	The Proposed RMP does not address the voluntary relinquishment of grazing permits and preference on a field office-wide basis. The Proposed RMP would determine the allowable uses of the public lands as provided for in FLPMA. FLPMA states in Section 202(a) that land use planning provides for the use of the public lands "regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses." The proposed plan has replaced the specific criteria based voluntary relinquishment of grazing permits and preferences with a generalized discussion per the Taylor Grazing Act; however, voluntary relinquishments would still be considered for portions of three allotments in the Desolation Canyon/Green River Corridor. Using voluntary relinquishments as a means to adjust land use plan allocations on these allotments would help mitigate impacts on the permittees. No other changes are proposed through a voluntary relinquishment process.

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83	BLM has violated the Taylor Grazing Act and grazing regulations and has failed to recognize existing grazing rights within the Price RMP/DEIS.	As provided for in FLPMA, the Proposed RMP proposes to allocate fewer AUMs to livestock and more to wildlife than in the previous land use plan to meet the plan's objectives and to recognize the importance of wildlife values. These changes in use would be made within the rangeland's ability to sustain the use allocations. The Secretary has the discretion under FLPMA to use the land use planning process to close areas to grazing, change levels of use, or to devote the land to another public purpose in accordance with the relevant land use plan. While it is BLM's goal to enhance rangeland health while providing for and recognizing the need for domestic sources of minerals, food, timber, and fiber, there is no requirement in the Taylor Grazing Act (TGA) or other applicable law for BLM to "maximize the number of domestic livestock AUMs" or to continue allocations "at historical levels." According to Section 2 of the TGA, the objective of the Act is to regulate the occupancy and use of the grazing districts and to preserve these lands. The grazing districts were established through a classification system established in the TGA. The combinations of uses proposed in the Proposed RMP are varied and diverse across the planning area and take into consideration the current and future needs of the public as well as what is consistent with FLPMA and the TGA.
84	The designation of Wild and Scenic Rivers has resulted in undue impacts and hardships or BLM's failure to designate all eligible river segments as Wild and Scenic Rivers violates FLPMA's "Unnecessary and Undue Degradation" mandate.	Suitability considerations for each eligible stream are fully disclosed in Appendix C of the Proposed RMP/Final EIS. Although the Proposed RMP would not find all of the eligible rivers suitable for congressional wild and scenic designation, other mechanisms to protect identified values, such as cultural and historical, are often applicable. Such mechanisms include, but are not limited to, Areas of Environmental Concern, National Historic Landmarks, Research Natural Areas, the National Register of Historic Places, WSAs, or management prescriptions such as No Surface Occupancy of areas leased for oil and gas exploration and development and closure of areas closed to OHV use. The suitability considerations presented in Appendix C provide a basis for decisions related to Wild and Scenic Rivers in the Proposed RMP. Congress has recognized that, through the multiple-use mandate, that there would be conflicting uses and impacts on the public land. As a matter of clarification, Unnecessary and Undue Degradation is a management standard that the BLM applies to third party public land users rather than planning decisions.
85	Congress did not authorize BLM to perform interim protective management of proposed wild and scenic river segments that are not yet approved by Congress.	FLPMA gives BLM broad authority to manage the public lands, including management of eligible and suitable river segments. For eligible rivers, BLM's policy is to protect certain values identified in the eligibility determination process to ensure that a decision on suitability can be made. To accomplish this objective, BLM must manage to protect the free-flowing character, tentative classifications, and identified outstandingly remarkable values of eligible rivers according to the prescriptions and directions of the current, applicable land use plan per BLM Manual Section 8351.32C which states that BLM managers shall: "Manage any eligible or designated WSR so as to protect and enhance (if possible) and not degrade any identified outstandingly remarkable river values." Therefore, BLM is obligated to avoid or otherwise mitigate any adverse affects to these values in the interim until Congress has an opportunity to act on potential designations. The BLM Manual further states that should a determination on suitability not be made during the planning process, "the RMP must prescribe protective management measures to ensure protection shall

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		be afforded the river and adjacent public land area pending the suitability determination" (Section 8351.33A).
86	Designation of any of the streams and tributaries or drainage areas used as a municipal water source, as Wild and Scenic Rivers could result in assertions of minimum water flows. This could impact the water rights and water flows to the communities.	The BLM has worked with all co-operators to ensure that any effects of decisions regarding Wild and Scenic Rivers are considered. Barring congressional action, there would be no effect on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect 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 doesn't require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through state processes. Thus, for congressionally designated rivers, BLM may assert a federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values.
87	The Proposed RMP should find all eligible river segments suitable for inclusion as a W&SR.	All streams in the PFO were given consideration (including riparian areas) for their potential designation as a Wild and Scenic River. Appendix C of the Proposed RMP/Final EIS fully describes the review and evaluation process for determining which are eligible and suitable for such designation.
88	The Draft RMP/EIS is contrary to law to the extent it even considers recommending for Wild and Scenic River designation those drainages that are not free flowing 12 months out of the year.	There are no specific requirements concerning minimum flow for eligible rivers. Flows are considered sufficient if they sustain or complement the outstandingly remarkable values for which the stream would be designated. However, none of the streams determined to be eligible (see Appendix C, Table C-4 of the Proposed RMP/Final EIS) are considered "dry washes," i.e., ephemeral steams which flow only in direct response to precipitation or have channels above the water table at all times. The BLM does include in the inventory of eligible rivers intermittent streams which have interrupted flow regimes or flow seasonally. Intermittent streams should not be automatically precluded from further consideration as a Wild and Scenic River based solely on their limited flow. Streams representative of desert ecosystems should also be considered for inclusion. In fact, rivers with intermittent flows have been designated into the National Wild and Scenic Rivers.
89	Why isn't there a OHV specialist employed in the field office?	The List of Preparers in the Proposed RMP/Final EIS identifies the specialists responsible for the recreation analysis and their educational background. However, BLM staffing resources and the hiring of additional staff is not an RMP issue and is not addressed in this planning effort.
90	Protect fragile or critical soils from ORV, livestock, or other uses that may cause damage.	The mixing of soil horizons from the extraction and subsequent refilling would create irreparable impacts to the local soil. Removal or destruction of biotic crusts would also cause long-term

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		impacts to the soil, creating increased potential for erosion. Implementing the stipulations contained in Appendix G, Stipulations for Surface Disturbing Activities, is meant to mitigate the disturbance. The determination as to whether an impact is “long-term” or “short-term” is subjective. The exact time that a reclamation effort may be completed and deemed successful depends on climatic factors as well as soil types and reclamation methods. This would also pertain to whatever disturbed area is being reclaimed (pipeline corridors, well pads, roads). The Final EIS points out that oil and gas development could cause (long-term or short-term) impacts on soils, water, and riparian. Soil disturbing activities have an impact on soils even with implementation of mitigating measures. Lack of surface disturbing activities in an area, through closures or restrictions, could benefit soils, water, and riparian areas if such surface disturbing activities would cause accelerated erosion, water depletion, or riparian area degradation.
91	The RMP inadequately protects paleontological resources or an exception should be added to allow for surface disturbance in geologic formations that are known not to contain these resources.	The Price Field Office has an abundance of scientifically important paleontological resources. Through analysis of the proposed actions, paleontological resources will be protected and opportunities for future (long-term and short-term) research will be maintained. Impacts on vertebrate and significant non-vertebrate paleontological resources from surface disturbing activities will be mitigated through assessing paleontological resources in the area of disturbance. BLM policy (BLM Handbook 8270-1) and the assessment process in the Proposed RMP/Final EIS rely on data review. Based on the results of a preliminary assessment, a field survey could be required. If BLM determines an area is “very unlikely to produce vertebrate fossils or noteworthy occurrences of invertebrate or plant fossils” (BLM-H-8270-1) a field survey would likely not be necessary. Results of field surveys would be used to develop mitigation and monitoring plans for surface disturbing activity. Even where field surveys are not required, operators are generally required to notify the BLM if fossils are encountered so that mitigation can be implemented.
92	The decisions for recreation management in the Alternatives and the impact analysis are inconsistent and should be edited.	See GCR 53. The Proposed RMP/Final EIS has been formatted and edited to improve clarity and reader understanding.
93	The BLM is precluding future decisions by including too many site specific recreation (activity level) decisions in the Draft RMP/EIS for SRMAs.	Issues related to site-specific planning decisions are being deferred to activity level planning and implementation, which will be completed for areas such as SRMAs and developed recreation sites after the completion of the RMP. Site specific decisions include site engineering and design, management of fire rings, signage, and recreation user fees for specific areas and law enforcement. Many of the SRMAs have existing activity plans that will be updated as necessary to address these issues and will involve public input, including State and local governments.
94	Why isn’t there a OHV specialist employed in the field office?	The List of Preparers in the Proposed RMP/Final EIS identifies the specialists responsible for the recreation analysis and their educational background. However, BLM staffing resources and the hiring of additional staff is not an RMP issue and is not addressed in this planning effort.
95	BLM should not allow wild horse and burro populations to exceed AML.	Under the Proposed RMP the overall initial AML for horses and burros would be that same as No Action, 150-250 horses and 50-70 burros. Maintaining wild horse and burro populations at the AML is accomplished through periodic gathers as directed by law and regulation. Implementation of gathers is governed nationally, based on the number of horses in the wild horse system.

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		Individual Field Offices can plan for removals, but actual removals are approved by the Washington Office before herds can be reduced. Maintaining genetically viable populations, including introducing wild horses or burros from other herd areas, would be accomplished within the established AMLs. Consolidation of the Muddy Creek with the Sinbad horse herds into one HMA would not increase the number of wild horses in HMAs, but would redraw the boundaries to more accurately reflect wild horse population, distribution and interactions.
96	Don't allocate forage to wild horses or burros if it takes forage from livestock (present or future).	The AUMs for wild horses and burros were set aside in previous plans; however the plans never specifically allocated them for wild horses and burros. This Proposed RMP accomplishes that allocation. Future changes in allocation based on monitoring data must comply with Code of Federal Regulations Title 43 subpart 4710.5(a): "If necessary to provide habitat for wild horses or burros, to implement herd management actions or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock."
97	Manage forests and woodlands to prevent and remove fuel loading and bio-mass buildup while reducing insect and disease.	BLM management of forest and woodland resources includes implementing the Healthy Forests Restoration Act of 2003. Title I of the Healthy Forests Restoration Act addresses vegetation treatments on certain types of National Forest System and BLM lands that are at risk of wildland fire or insect and disease epidemics. This Act also directs the establishment of monitoring and early warning systems for insect and disease outbreaks including encouraging biomass removal from public and private lands. Table 2-3 of the Proposed RMP/Final EIS describes management actions for vegetation under the alternatives analyzed in detail.
98	The BLM doesn't need to restrict domestic sheep grazing to greater than nine miles from Big Horn sheep habitat.	North American native wild sheep did not evolve with domestic livestock, and therefore they are vulnerable to a variety of diseases and parasites carried by livestock, particularly domestic sheep and goats. There are documented cases of native wild sheep interacting with domestic sheep which resulted in harmful consequences to the wild sheep. There is consensus among both wild and domestic sheep specialists that the most effective tool for minimizing disease problems is to keep them physically separated. In BLM's "Revised Guidelines for Domestic Sheep and Goat Management in Native Wild Sheep Habitats" a buffer of 9 miles was recommended for sheep grazing on public lands. Such restrictions would not be applicable off public lands.
99	Opportunities for mineral development should not be excluded to provide for other resources and uses under the multiple use concept.	The term "multiple use" as defined in the Federal Land Policy and Management Act (FLPMA) 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 EIS includes a detailed evaluation of all options to ensure a balanced approach was recommended that will ensure protection of resource values and sensitive resources while allowing opportunities for mineral exploration and production. The Proposed RMP will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
100	Livestock grazing should not be precluded from the Cleveland-Lloyd Dinosaur Quarry NHL.	The RMP management decisions for the Cleveland Lloyd Dinosaur Quarry SRMA or ACEC, contained in chapter 2, do not address livestock grazing management. The developed portions of

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		Cleveland-Lloyd Dinosaur Quarry, limited to the quarry, visitor center, and picnic area, would be closed to livestock grazing according to the decision on Draft RMP/EIS page 2-67. The remainder of the CLDQ SRMA would remain open to livestock grazing. Approximately 50 acres of the 80 acre NNL is presently fenced and therefore closed to livestock grazing. Future recreation developments (see Draft RMP/EIS page 2-125 & 126) beyond these 50 acres to accommodate increasing use could result in further future impacts to livestock grazing due to recreational conflicts or additional fencing.
101	The Draft RMP/EIS should not allow for oil and gas leasing in areas with wilderness characteristics.	See GCRs 2, 12, 38, and 111. The Draft RMP/EIS and Proposed RMP/Final EIS evaluate a range of alternatives to assure a balanced approach that ensures protection of resource values and resource uses while allowing opportunities for other activities such as mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development and other uses. The BLM released the Supplement to the PFO Draft RMP/EIS for Non-WSA Lands with wilderness characteristics in September 2007. This supplement evaluated all lands nominated as having wilderness characteristics (including all lands within the Redrock Wilderness Bill) and analyzed Alternative E which would protect these areas. WSAs will be managed according the wilderness IMP until Congress either designates them as wilderness or releases them for uses other than wilderness.
102	It is not clear how BLM is planning to determine stocking levels and seasons of use on each grazing allotment. There should be an allotment-by-allotment accounting for range productivity, monitoring plans, resource conflicts present, etc.	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 land use plan goals and objectives. The monitoring plan conforms to manual requirements and is subject to changes as new data are assimilated.
103	BLM needs to recognize livestock grazing as a valid existing right in the RMP.	Livestock grazing on the public lands is a privilege granted by Congress under the Taylor Grazing Act and FLPMA rather than a valid property right. However, as noted in the response to GCR 105, 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).
104	Grazing should not be prohibited during the antelope fawning season. OHV access to existing and future range improvements must be allowed.	None of the Alternatives would prohibit grazing during antelope fawning season. The identified action would be to consider adjustments to grazing to improve forb production. As stated in Section 2.3 access to range improvements would be allowed through routes documented in the

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		individual project files.
105	Why was livestock use removed from the Rock Creek and Desolation Canyon area along the Green River? The methods alluded to in making decisions for the Rock Creek allotment are not scientifically sound.	BLM is proposing to resolve resource issues/conflicts (riparian condition, erosion, recreation, water quality etc.) through the use of a voluntary relinquishment process. Monitoring shows if conditions have improved over the years and if current management can continue without degradation of the resource. Providing for the voluntary relinquishment of the grazing permits without their reissuance is one method that can be used to minimize or eliminate these issues and concerns without taking adverse action on the permittee and potentially upsetting his/her livestock operation. BLM has not removed grazing in the Rock Creek area along the Green River; the Draft RMP/EIS considers a range of alternatives, including continuing livestock grazing as currently managed, changes in season of use, and retirement if a permittee voluntarily relinquishes the privilege. Several types of monitoring data were used to support the decision and analysis. Historical monitoring data with photographs show that the area was heavily grazed which reduced vegetative cover, increased soil erosion and degraded riparian conditions. Resource conditions have improved with no livestock grazing for the past 20+ years. Cottonwood tree galleries and willow thickets along the river take many years to establish and to maintain themselves. Age class structure and distribution of the trees and willows along the river show the influence of grazing intensity in different reaches of the river. There has been a dramatic increase in young trees and willows being established in the past 20+ years with the reduced numbers of livestock in the river corridor. Thousands of boat floaters visit this stretch of the Green River every year. Foot traffic on trails and at campsites is impacting soil and vegetation resources along the river. Livestock, wildlife and humans all contribute to bacterial coli form pollution in water supplies. Water quality measurement has been completed with scientifically sound methods. Water samples of the Green River have been taken by trained and certified personnel. Incubation equipment has been taken with the personnel during river trips to perform water testing within established protocol. Statistically reliable methods were employed to reach the conclusions pertaining to water quality for coli form bacteria levels. Water flows have been controlled at the Flaming Gorge Dam by the Bureau of Reclamation. This has had an influence on river vegetation, however monitoring data indicates overgrazing by livestock was a major factor for vegetation changes along the river and its tributaries. Historically cattle have grazed in the Rock Creek drainage during most of the year, along the Green River from October through May and in the high elevations from June to September. Wildlife use is free roaming, dispersing impacts compared to livestock use. Present wildlife numbers and the resulting grazing use are below the historical livestock numbers and use levels. UDWR is responsible for herd management through population control with hunting target numbers.
106	The analysis of impacts to Special Status Species needs to be expanded.	See GCRs 4, 5, and 65. More detail regarding impacts and conservation measures has been incorporated into the Proposed RMP/Final EIS.
107	Why is each of the SRMAs necessary? A management plan is already in place for Desolation Canyon and recreational activities. This corridor does not require the formulation of a	Special Recreation Management Area (SRMA) designation is an administrative designation, used by the BLM to organize and prioritize its recreation programs and management. This is a designation that is transparent to the public users. According to the Land Use Planning Handbook

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	SRMA. The Nine Mile area could be managed according to the 1995 Recreation and Cultural Area Management Plan without a SRMA designation.	(H-1601), a SRMA has a distinct, primary recreation-tourism market as well as a corresponding and distinguishing recreation management strategy. The Handbook also states that if the recreation activity requires maintenance of setting character and/or production of activity, experience, and benefit opportunities/outcomes, the area should be identified and managed as a SRMA. SRMA designation gives BLM the ability to prescribe and manage recreation use. In the case of Desolation Canyon, it is one of the most intensely managed recreation experiences in the Price Field Office. Permits are required, access is limited, and activities are regulated. Nearly all of this management is accomplished off-site, with virtually no infrastructure except at the launch point and take out. Desolation Canyon has been a SRMA since approximately 1983. In the case of Nine Mile Canyon, it is being proposed as a SRMA because it has a plan and custodial management of recreation is no longer appropriate for that area.
108	The Draft RMP/EIS does not comply with FLPMA and BLM instructional memoranda regarding lands with wilderness characteristics.	BLM is not required to protect all lands with wilderness characteristics. FLPMA and BLM policy require that FLPMA Section 603 WSAs be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (IMP) until Congress acts. Other "non-WSA lands with wilderness characteristics" are found in the PFO. Although BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, FLPMA Sections 201, 202, and 302 and BLM Washington Office Instruction Memoranda (IMs) Nos. 2003-274 and 2003-275—Change 1 provide that BLM may elect to manage non-WSA lands with wilderness characteristics using other prescriptions to protect those characteristics. BLM Planning Handbook (H-1601-1, Appendix C, Page 12) directs that planning decisions be identified to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation) and that the RMP may include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, BLM may include conditions of use that would avoid or minimize impacts to wilderness characteristics. BLM complied with the IMs and Planning Handbook by analyzing protective management for all non-WSA lands with wilderness characteristics as Alternative E in the supplement released September 2007 and the Proposed RMP/Final EIS.
109	The Price RMP/EIS does not adequately protect BLM lands with wilderness characteristics.	See GCRs 108 and 111.
110	The BLM decisions in the Price RMP/DEIS do not recognize valid existing rights.	Valid existing must be recognized by BLM and do not require specific planning decisions 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 decisions 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,

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		redesigns, or delay of proposed actions. Further, Chapter 2, page 5 of the Draft RMP/EIS, section 2.4.1 Wilderness Study Areas, states that WSAs will be managed in a manner that does not impair their suitability for designation as wilderness, subject to valid existing rights. Livestock grazing is a privilege rather than a valid existing right. Also, see GCRs 17, 106, 131, and 143.
111	The BLM should manage all areas within the Redrock Wilderness Bill to protect their wilderness values.	The BLM released Supplement to the PFO Draft RMP/EIS for non-WSA lands with wilderness characteristics in September 2007. This supplement evaluated all lands nominated as having wilderness characteristics (including lands within the Redrock Wilderness Bill) as Alternative E which would protect all of these areas. WSAs will be managed under BLM's IMP until Congress either designates them as Wilderness or releases them for uses other than wilderness.
112	The Draft RMP/EIS is not clear on how WSAs would be managed if released by Congress from consideration as wilderness.	The Price Field Office manages 11 WSAs in a manner consistent with the IMP. After considering comments on the Draft RMP/EIS, management of WSAs if released by Congress from wilderness consideration was revised for the Proposed RMP/FEIS. Should any WSA, in part or in whole, be released by Congress from wilderness consideration, proposals in the released area would be examined on a case-by-case basis for consistency with the goals and objectives of the RMP decisions. When appropriate, a land use plan amendment or amendments may be initiated.
113	The Chapter 4 impact analysis for WSAs and non-WSA lands with wilderness characteristics is inadequate.	See GCR 115. BLM used the best available scientific information in the impact analysis for this Proposed RMP/Final EIS and included the information needed for analysis of the decisions. The analysis discloses future actions to occur following the adoption of this plan and outlines those actions as future actions to be taken. BLM acknowledges that there are uncertainties remaining and has identified these uncertainties.
114	The BLM should or should not designate more WSAs.	The BLM does not have the authority to designate new WSAs under the land use planning process.
115	The DEIS imposes VRM I and II in WSAs contrary to law and policy. VRM I and II should not be used within WSAs.	BLM Washington Office Instruction Memorandum (IM)-2000-96 states "it is the Bureau position…that all WSAs should be classified as Class I, and managed according to VRM Class I management objectives until such time as the Congress decides to designate the area as wilderness or release it for other uses." The IM further explains "…the VRM management objectives are being used to support WSA management objectives. For WSAs, this is not only about visual values as many WSAs do not necessarily contain exceptionally high scenic values. 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." As the VRM I objective is to "preserve the existing character of the landscape" (BLM-H-8410) such a designation would perfectly compliment WSA management as explained in the IMP.
116	Areas that have been identified as "likely to have wilderness characteristics" should or should not be utilized as new information in this planning effort.	See GCR 108. Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to balance competing resource uses and choose how the non-WSA lands ultimately will be managed, after considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.
117	The BLM should be more specific about the purpose for the Nine Mile Canyon SRMA addressing recreation and interpretive opportunities. Develop signs for visitors that	In 1995 a Recreation and Cultural Area Management Plan as well as an interpretive plan were developed, for the Nine Mile Canyon area. These plans have not been implemented but both are carried forward in the Proposed RMP and would be implemented as part of the SRMA

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	provide cultural interpretation. Develop safe and scenic turn-out locations for visitors. Include the provision of a safe recreating environment.	management. Issues related to site-specific planning decisions are being deferred to activity level planning and implementation, which will be completed after the completion of this plan.
118	The plan acknowledges that quantification of the economic stimulus associated with recreation in the PFO is not possible as this time due to lack of verifiable data on recreational use. This statement conflicts with Chapter 3 that provides Visitor, Participant, and Visitor Days data from the RMIS data system. The acknowledgement that verifiable data exists certainly seems to indicate that the major source of data is “professional judgement”. This is not a valid, scientific source of data for the types of decisions that are being made in this RMP.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of recreation to local communities, such as Emery and Carbon counties. For the region of influence the visitation figures discussed in Chapter 3, using RMIS data, are the best available information. Unfortunately information on recreation visitation is difficult to obtain in extremely remote areas with virtually unlimited an undetectable entry and exit points. Thus, dispersed recreation visitation estimates may be different than actual visitation. Factors influencing recreation visitation numbers include the number of visitors using trailhead registers, agency visitor centers, and fee campgrounds. As noted in the comment, the RMIS data is not considered valid enough to make quantitative analysis of jobs, earnings, tax revenues etc. tied to recreation in the local area. Instead, the Draft RMP/EIS and Proposed RMP/Final EIS provide qualitative analysis of socioeconomic impacts from potential changes in recreational activities under each of the alternatives.
119	The DEIS does not clarify the exact nature and scope of the Desolation Canyon SRMA and the logic governing the prescriptions attached to it. The Vernal plan addressed some of the issues concerning the SRMA; however, it is unclear how far north into Uintah County the SRMA extends, how it ties in with the special management prescriptions outlined in the old management plans for the Price and Vernal areas, or what guides the No Surface Occupancy prescriptions within it. The Desolation Canyon SRMA needs to be better documented and co-managed by the Vernal and Price field offices. The No Surface Occupancy for oil and gas within at least one mile of the river as prescribed in the 1979 River Management Plan should be carried through to protect recreation opportunities.	The Price and Vernal Field Offices' have collaborated on the establishment and boundaries for the SRMA and the portions of the SRMA that overlap both Field Offices will be managed according to the inter-district (office) agreement for recreation. The Price Field Office agrees that additional coordination with the Vernal Field Office is necessary for management of the SRMA. The Vernal Draft RMP/EIS has been published and provides an opportunity for the public to review the SRMA boundaries and prescriptions that exist in both field offices. The existing Desolation and Gray Canyons of the Green River Management Plan would continue to be used as the activity plan for the Desolation Canyon SRMA. Extensive land use restrictions are proposed in the DEIS for Gray Canyon WMA and Desolation Canyon SRMA. Recreation use would be aggressively managed to meet the goals and objectives of these areas. Both the Gray Canyon WMA and the Desolation Canyon SRMA would be closed to OHV use and designated as NSO areas for oil and gas leasing (DEIS, Pgs. 2-41 and 2-69). These restrictions are considered adequate to protect the sensitive resource values within these areas.
120	Wilderness areas should be protected. There shouldn’t be any wilderness areas or there should be more wilderness areas.	Only Congress can designate an area as wilderness. There are no Congressionally designated Wilderness Areas in the Price Field Office. WSAs would be managed under BLM’s Interim Management Policy and Guidelines for Lands Under Wilderness Review. The BLM released the Supplement to the PFO Draft RMP/EIS for non-WSA lands with wilderness characteristics in September 2007. This supplement evaluated all lands nominated as having wilderness characteristics and analyzed Alternative E which would protect these areas.
121	Impact analysis on cultural resources is lacking in content, substance, or is unclear in substance or format.	Impact analyses were revised to reflect changes in the alternatives and to improve the clarity and readability of the document. Impacts on cultural resources from other resource management decisions and uses are analyzed in Section 4.2.4 of the Proposed RMP/Final EIS.
122	BLM needs to prioritize development of mineral resources in	The management actions presented in Table 2-17 of the Proposed RMP/Final EIS address

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	areas were oil, gas, or coal bed natural gas and coal development would be in conflict with each other.	resolution of conflicts between oil, gas, or coal bed natural gas and coal resources. The management actions proposed under the Proposed RMP would allow BLM to identify conflict areas and promote safe and efficient extraction of energy resources. BLM also will identify potential conflicts in the various types of energy resource production on a case-by-case through site-specific analysis of proposed developments.
123	In general the impact analysis is inadequate and difficult to understand.	BLM used the best available scientific information in the impact analysis for this management plan and included the information needed for analysis of the decisions in this Proposed RMP/Final EIS. The Proposed RMP outlines and discloses future actions to occur following completion of the RMP. More site-specific NEPA analysis will be performed on future implementation actions. BLM acknowledges that there are uncertainties remaining and has identified these uncertainties. The Proposed RMP/Final EIS provides general guidance for building partnerships and coordinating resource management among the many partners that manage lands within the PFO boundary under each of the alternatives analyzed in detail.
124	The Draft RMP/EIS maps did not provide sufficient information or were inadequate.	Map content in the RMP has been completed from BLM standard datasets and presented with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The text of the Proposed RMP/Final EIS provides clarification of maps and specific comments were reviewed for each map to determine whether changes should be made. The 8 1/2” by 11” format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review, however more detailed information can be obtained from BLM data sets and shape files.
125	The public comment period on the Draft RMP/EIS should be extended.	The BLM provided the public with 90 days to review and comment on the DRMP/EIS as required by the BLM land use planning regulations (43 CFR 1610.2(e)). The standard comment period for a DEIS is 45 days in accordance with CEQ regulations at 40 CFR 1506.10(c). Therefore the BLM initially provided double the amount of time for public review and comment required by the CEQ. The 90-day public comment period was extended for an additional 45 days, closing on November 29, 2004. The 135-day public comment period allowed the public to review the BLM's data and review processes for ACECs, Wild and Scenic Rivers, OHV route designations etc. Public comment periods also were provided for the supplements on ACECs and non-WSA lands with wilderness characteristics.
126	No justification was provided in the Draft RMP/EIS for why some nominated ACECs were not considered in the Draft RMP/EIS.	This oversight was corrected with publication of the Supplemental Information and Analysis to the Price Field Office Draft RMP/EIS for ACECs in June 2006. Appendix L of the Proposed RMP/Final EIS includes information about BLM’s evaluation of all nominated ACECs.
127	The BLM should have reevaluated the relevance and importance of the existing ACECs in the planning process.	The relevant and important values for which existing ACECs were established in the San Rafael RMP are addressed in detail in that document. In its Notice of Intent to prepare the Price RMP (Federal Register, Vol. 66, No. 216, November 7, 2001, Notice of Intent, Environmental Impact Statement, Price Resource Management Plan, Utah), the BLM identified the 13 existing ACECs created in the San Rafael RMP of 1991. The NOI explained BLM’s intention to bring these ACECs forward into the Price RMP/EIS. A scoping report was prepared in May of 2002, to summarize the

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		public and agency comments received in response to the NOI. The few comments that were received were supportive of continued management as ACECs. The ACEC Manual (BLM Manual 1613, 9/29/88) states: "Normally, the relevance and importance of resource or hazards associated with an existing ACEC are reevaluated only when new information or changed circumstances or the results of monitoring establish a need."
128	The Draft RMP/EIS does not explain how valid existing rights will be accommodated in the ACECs with restrictive management.	Valid existing rights must be recognized by BLM and do not require specific planning decisions 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 decisions 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. Livestock grazing is a privilege rather than a valid existing right. Also, see GCRs 17, 106, 131, and 143.
129	BLM does not have the authority to designate ACECs that include "natural process" as a relevant and important value.	FLPMA specifically uses the term "natural systems" in its definition of ACEC. The FLPMA definition of ACEC as an area "within the public lands where special management attention is required (when such areas are developed or used, or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes (emphasis added), or to protect life and safety from natural hazards" (FLPMA Sec. 103(a)).
130	BLM cannot designate ACECs because they are not consistent with county plans.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.
131	The Draft RMP/EIS does not contain an adequate range of alternatives in ACECs because there was no alternative that considered no ACECs. Also a full range of prescriptions within the ACECs was not considered.	The Land Use Planning Handbook, H-1601-1, requires consideration of many factors in the development of alternatives (i.e. meet the purpose and need for the action; meet the goals and objectives for the plan; can be feasibly carried out based on cost, logistics, technology, and social and environmental factors; represents a different land use plan that addresses and/or resolves the planning issues; decisions may be common to some or all of the alternatives; components of each individual alternative must be complementary; and developed in an open, collaborative manner to the extent possible). With cooperators assistance and public input, BLM has met the handbook requirements.
132	The Draft RMP/EIS should include an analysis of the socioeconomic impacts of allowing or denying multiple use access to public lands in Carbon and Emery Counties.	Additional information has been provided on all economic factors used to evaluate socioeconomic impacts. Section 3.6 of the Proposed RMP/Final EIS has been written and edited to further describe the social make-up and economic conditions of Emery and Carbon Counties. Additional

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		social concepts including prehistory, settlement patterns, history, culture, and traditional values are provided. The Proposed RMP/Final EIS includes an appendix summarizing the results of the Utah State University public lands survey commissioned by the Governor's office. Socioeconomic Impacts of the Proposed RMP are fully evaluated in Section 4.6. Included is analysis of how BLM lands and federal mineral estate managed within Emery and Carbon Counties affect local, state, and federal government budgets and expenditures from mineral royalties, taxes, Payment in Lieu of Taxes, fees and other revenues under each alternative. 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 (Booz Allen 2008a). 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 including jobs, income, tax revenues, etc. associated with the direct industries tied to the multiple uses on BLM land. This discussion explains in detail how direct industries, such as energy production, generate additional, income and employment for indirect industries (trucking, lodging, etc.).
133	The Draft RMP/EIS socioeconomic analysis did not discuss the impacts that would result on the local and state tax base.	Chapter 3, Section 3.6 of the Proposed RMP/Final EIS includes an description of public finance and government services related to the use of BLM lands and resources. This includes an explanation of how BLM lands and federal mineral estate managed within Emery and Carbon Counties affect local, state, and federal government budgets and expenditures from mineral royalties, taxes, Payment in Lieu of Taxes, fees and other revenues. Potential impacts to public finance and government services from mineral revenues under each alternative are analyzed in Section 4.6.
134	The analysis of impacts to visual resources is inadequate and it is not clear how protection of visual resources would limit development.	In the Proposed RMP/Final EIS the impacts of visual resource management (VRM) on other resources and uses are addressed in the analysis of impacts on each resource and use. For example, the impacts of VRM on Minerals and Energy Development are analyzed in Section 4.3.5. The RMP process establishes specific management objects for the area's visual resources based on the various resources uses and values. These designations are developed through public participation and collaboration. Subsequent to the land use planning process, a determination is made whether proposed surface-disturbing activities or development will meet the visual resource management objectives established for the area and whether design adjustments will be required. A visual contrast rating process is used for this analysis, which involves comparing the project features with the major features in the existing landscape using the basic design elements of form, line, color, and texture. This process is described in the BLM Handbook H-8431-1, Visual Resource Contrast Rating. The analysis is then used as a guide for resolving visual impacts. Managers have the option of attaching additional mitigation stipulations to bring the proposed surface-disturbing activity into compliance with the VRM objectives and can decide whether to accept or deny project proposals.
135	The BLM should require all resource uses to meet Visual Resource Management (VRM) objectives. The state objects	BLM's national Planning Handbook, H-1601-1, Appendix C(I) requires that through the land use planning process, BLM set objectives for management of visual resources (landscapes) of all

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	that the Draft RMP does not make information supporting the VRM inventory class determinations proposed by BLM available for review.	lands under its administration. Any action BLM implements must comply with those objectives. While the Price Draft RMP/EIS and Proposed RMP/Final EIS do not include detailed information on BLM's visual resources inventory, that information is available for inspection in the Price Field Office.
136	VRM I and II classifications constitute de facto wilderness management in violation of the multiple use mandate of FLPMA. VRM classification is moot in WSAs because the non-impairment standard protects these areas.	See GCR 139. Through the land use planning process, BLM sets objectives for management of visual resources (landscapes) of all lands under its administration. Any action BLM implements must comply with those objectives. Management of WSAs must be consistent with the Wilderness IMP, but VRM in WSAs is not moot. When BLM sets visual resource management objectives in land use planning, objectives must be consistent with management of WSAs to preserve their wilderness character. VRM objectives for WSAs are set as Class I to preserve the existing character of the landscape.
137	The practice of inventorying and evaluation of lands for the purpose of giving visual ratings or management classes, which will determine the amount of modification allowed to the basic elements of the landscape, is not consistent with county plans.	See GCR 29. The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.
138	Proper BLM management can be accomplished reasonably without layering levels of restrictions through various designations.	"Layering" is a planning tool. Under FLPMA's multiple use mandate, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple use concept, the BLM doesn't necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The process of applying many individual program goals, objectives, and actions to the same area of public lands may be perceived as "layering". The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan, and litigation. Whether or not a particular form of management is restrictive depends upon a person interests or desires in how public lands should be managed. Not all uses and values can be provided for on every acre. That is why land use plans are developed through a public and interdisciplinary process. The interdisciplinary process helps ensure that all resources values and uses are considered to determine what mix of values and uses is responsive to the issues identified for resolution in the land use plan. Layering of program decisions is not optional for BLM, but is required by the FLPMA and National BLM planning and program specific regulations.
139	BLM must recognize valid existing rights in WSAs.	Chapter 2, page 5 of the Draft RMP/EIS, section 2.4.1 WSAs, states that WSAs will be managed in a manner that does not impair their suitability for designation as wilderness, subject to valid existing rights. Valid existing must be recognized by BLM and do not require specific planning

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		decisions 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 decisions 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.
140	Wilderness quality lands (WSA and 1999 BLM inventoried wilderness quality lands) should be maintained VRM I. Special Recreation Management areas and ACEC's should be maintained at VRM I or II throughout. The VRM I rating is restricted to Class 1 wilderness areas, congressionally designated wild and scenic river segments, and other areas where congressional decisions or legitimate administrative decisions have been made to preserve a natural landscape. Is VRM class I management lawful for WSA's? Allowing VRM class III in Nine Mile Canyon would impact the scenic, historic, and prehistoric values that Nine Mile Canyon is famous for.	VRM objectives in SRMAs and ACECs would be prescribed consistent with the purpose of the area. For example, VRM Class I objectives might be appropriate in an ACEC designated for the protection of T & E species and their habitat. On the other hand, if it is necessary to treat vegetation to restore that habitat, VRM Class I objectives – preserving the existing landscape - might not be consistent with that need. On the other hand, if the management emphasis in a SRMA is on cross-country motorized travel and developed camping, VRM Class III or IV objectives - that allow for more modification of a landscape - might be more appropriate. In the case of Nine Mile Canyon, the SRCMP does identify the area to be managed as VRM II. The Proposed RMP changes some of the area to VRM III to accommodate other objectives in the canyon (e.g. cultural interpretation). The Proposed RMP/Final EIS analyzes the impacts of VRM on other resources and uses under the appropriate resource and use headings.
141	Designate lands with wilderness qualities as ACECs or the use of ACECs is not appropriate to preserve non-WSA lands with wilderness characteristics.	Pursuant to BLM Manual 1613, "An ACEC designation will not be used as a substitute for wilderness suitability recommendations". The BLM does not have the authority to designate new WSAs under the land use planning process.
142	The BLM did not recognize or use the input from all members of the public.	BLM values input from all members of the public. All public input is read and analyzed and considered in development of the Proposed RMP/Final EIS. Data submitted by the public is part of the record for the planning effort and is utilized when applicable in Chapter 3 and 4 of the EIS. All comments were reviewed and considered during the formulation of the Proposed RMP. Many letters were submitted by organizations representing specific interests. These comments were reviewed in the same way that comments from individual citizens were reviewed. Please see Section 5.6 in the Proposed RMP/Final EIS for a description of how all comments were reviewed. All comments received, regardless of the sender, were part of the same content analysis process.
143	Due to inadequacies and deficiencies in the alternatives and analysis, the BLM must prepare a supplemental Draft EIS.	According to Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (CEQ NEPA guidelines) at 40 Code of Federal Regulations (CFR) 1502.9(c), "Agencies shall prepare supplements to either draft or final environmental impact statements if: (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts." There is no need for further supplementation of the Draft RMP/EIS for the following reasons: 1)The alternatives analyzed in detail were refined and the Proposed Plan/Final EIS

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		incorporates changes as necessary based on the commenter's concerns; 2)BLM provided informational meetings on the Draft RMP/EIS for a variety of topics in August, 2004, the Salt Lake meeting was held on August 31, 2004; 3)BLM documented all public outreach activities, including these informational meetings and provided a multi-faceted outreach strategy in order to involve the public in all phases of this collaborative planning effort, including but not limited to Federal Register publications, planning bulletins, open houses for scoping and other informational purpose, news releases, website notification, television promotion, as well as informational meetings on the DRMP/DEIS, and 4)supplements to the Draft RMP/EIS regarding ACECs and non-WSA lands with wilderness characteristics were prepared with public involvement and comment. Chapter 5 of the Proposed RMP/Final EIS summarizes this information.
144	The BLM should close WSAs to OHV use.	The BLM Wilderness IMP allows for OHV use on existing ways that were identified during the inventory in WSAs as long as impairment of wilderness values does not result from this use. WSAs are closed to OHV use in the Proposed RMP/Final EIS with the exception of the four routes in the Sids Mountain WSA. Inventoried wilderness characteristics were used as a criterion in designating routes. Non-WSA lands with or likely to have wilderness characteristics may have specific designated routes, but will no longer be open for cross-country motorized travel. Areas with special management designations, such as ACECs, do not always require OHV closures, depending on the purpose and management prescriptions for each area to protect sensitive resources such as relict vegetation and cultural resources. Specific management actions for the lands identified in America's Redrock Wilderness as put forth in the Castle Country Heritage Plan have been considered in Alternative C; however, these lands are not being considered as new WSAs.
145	Public outreach efforts have been inadequate and there has been a lack of clear information on coordination and consultation.	BLM provided informational meetings on the DRMP/DEIS in August. The Salt Lake meeting was held on August 31, 2004. These meetings were conducted for informational purposes for a variety of topics relative to the Draft document. BLM documented all public outreach activities, including these informational meetings. In addition, BLM provided a multi-faceted outreach strategy in order to involve the public in all phases of this collaborative planning effort, including but not limited to: Federal Register publications, planning bulletins, open houses for scoping and other informational purpose, news releases, website notification, television promotion, as well as informational meetings on the Draft RMP/EIS. Additional public comment periods were offered for the Supplements to the Draft RMP/EIS. Chapter 5 of the Proposed RMP/Final EIS summarizes this information.
146	A brief description of Utah v. Norton should be included to provide the reader with an answer to why the BLM won't consider designations of new WSAs in the RMP process.	A brief description of the Utah v. Norton settlement agreement can be found in Chapter 3, Section 3.2.11 of the Proposed RMP/Final EIS.
147	BLM funding and budget is inadequate to accomplish or accommodate the Proposed Plan.	The BLM's multiple-use mission as directed by Congress is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other

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		resources on the public lands. BLM will seek to obtain funding for implementation and mitigation of the Final Price RMP. Because funding is provided by Congress, it is beyond BLM's control. BLM has assumed that because Congress has directed the BLM to manage public land, it would continue to fund it adequately to manage resource uses and protect the health and safety of the public and the resource values on the public lands.
148	The tentative Wild and Scenic River classifications developed during the determination of eligibility should be carried forward in all alternatives. The Green River through Desolation Canyon should be "wild" in the preferred alternative.	Since a river's classification provides a framework for the management prescriptions applied within the river area, some flexibility, though limited, is necessary to consider a range of alternative tentative classifications. BLM's Wild and Scenic River Manual (Section 8351.33C.) states, "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include to resolve conflicts with other management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations.
149	The region of comparison used to determine the Outstandingly Remarkable values for wild and scenic river eligibility was too small or not well defined.	Appendix C of the Proposed RMP/ Final EIS clearly explains how the region of comparison was identified and used to determine which values are at least regionally significant.
150	BLM is mandated by congress to consider potential W&SR during the RMP process.	The BLM is mandated by Congress through the provisions of Section 5 (d) (1) of the Wild and Scenic Rivers Act to consider streams with potential for inclusion into the national system of rivers in all planning for the use and development of water and related land resources. The BLM is fully evaluating and considering potential impacts related to Wild and Scenic River decisions in this planning process. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Final EIS. Suitability issues are addressed for all eligible stream segments in Appendix C of the Proposed RMP/Final EIS.
151	The Draft RMP/EIS failed to discuss the impacts of Wild and Scenic River designation on private landowners.	Under the Wild and Scenic Rivers Act, designation of a river neither gives nor implies government control of private lands within the river corridor. Although Congress could include private lands within the boundaries of the designated river area, management restrictions would apply only to public lands. Private land owners would be able to use their property as they had before designation.
152	ACEC analysis is not precise, impacts from individual ACECs are not explained or are difficult to identify in the Draft RMP/EIS. Lumping all of the ACECs analysis together generalizes the impacts and is not consistent with the analysis approach for other resources.	Chapter 4 in the Proposed RMP/Final EIS address impacts of ACECs in terms of relevant and important values rather than by all ACECs together. This discloses the impacts of each individual ACEC.
153	The DEIS does not identify "irreparable damage" to ACECs. BLM misinterprets irreparable damage when reviewing and analyzing ACECs in the DEIS. The ACEC tool was intended by Congress to be limited to only those instances where irreparable damage would be caused without designation.	All nominated areas with relevant and important values are identified as potential ACECs and addressed in the alternatives. Appendix L in the Proposed RMP/Final EIS explains the definition of irreparable harm and Table 2-19 identifies the threats to the relevant and important values for each of the potential ACECs. On August 27, 1980, BLM promulgated final ACEC guidelines (45FED REG 57318) that clarify that the term "protect" means: "To defend or guard against

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	Most surface disturbing actions can eventually be repaired.	damage or loss to the important environmental resources of a potential or designated ACEC. This includes damage that can be restored over time and that which is irreparable. With regard to a natural hazard, protect means to prevent the loss of life or injury to people, or loss or damage to property." Thus, BLM is to consider the potential for both reparable and irreparable damage when protecting important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems through ACEC designation. This interpretation is consistent with FLPMA's legislative history and implementing policy.
154	The Nine Mile Canyon proposed ACEC does not provide appropriate protection for the relevant and important values or the Nine Mile Canyon proposed ACEC is too restrictive and is not necessary to protect the cultural resources.	In the Proposed RMP, the Nine Mile Canyon ACEC is in the canyon and would be NSO. Maps 2-30 through 2-34 and Map 2-63 of the Proposed RMP/Final EIS show fluid mineral leasing decisions by alternative and Maps 2-45 through 2-49 and Map 2-66 show ACEC boundaries by alternative. BLM identified special management for potential ACECs, as directed by BLM Manual 1613-1 which will protect and prevent irreparable damage to the relevant and important values. Special management for the potential Nine Mile Canyon ACEC was designed to protect and prevent irreparable damage to extensive and unique cultural resources and wildlife habitat while ensuring valid existing rights present. BLM agrees that the existing environment in Nine Mile Canyon, particularly in the case of scattered public lands, a county controlled right of way in the bottom of the canyon that is not subject to BLM limitations, and extensive previous use for recreation, ranching and mineral development, results in certain constraints in management options available for the Draft RMP/EIS. Management prescriptions have been adjusted accordingly to provide protection for relevant and important values while development continues on private lands and while providing access to minerals on public lands through directional drilling.
155	The ACECs are too large. They must be limited in size and programmatic scope to only those areas necessary to protect the relevant and important values or the ACECs are too small to protect the relevant and important values.	The BLM considered the acreage needed to protect and prevent irreparable damage to relevant and important values. Nominated ACECs or portions of nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives. As noted in the Draft RMP/EIS Appendix 26, "in some cases the interdisciplinary team review resulted in modified boundary configurations for some potential and existing ACECs based on the information provided in the nominations." Appendix L of the Proposed RMP/Final EIS explains the ACEC evaluations for the Price planning effort.
156	It seems the Draft RMP/EIS uses ACEC designations to expand the boundaries of WSAs. ACEC designation in WSAs is in opposition to BLM guidance and is an ineffective use of the ACEC designation.	The BLM has separate policies and guidelines, as well as criteria, for establishing ACECs and WSAs. These differing criteria make it possible that the same lands will qualify as both an ACEC and a WSA but for different reasons. The BLM is required to consider these different policies.
157	The Draft RMP/EIS does not include a discussion concerning the nature or type of threats to each ACEC that could result in irreparable damage.	All nominated areas with relevant and important values are identified as potential ACECs and addressed in the alternatives. Appendix L in the Proposed RMP/Final EIS explains the definition of irreparable harm and Table 2-19 identifies the threats to the relevant and important values for each of the potential ACECs.
158	No justification was provided for why proposed ACECs in some alternatives were not designated in the preferred	There is no requirement to carry forward all of the potential ACECs into the Proposed RMP. The BLM's ACEC Manual (1613) requires that all potential ACECs be carried forward as

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	alternative. BLM did not adequately address why all proposed ACECs were not carried into the preferred alternative in the Price RMP/DEIS.	recommended for designation into at least one alternative in the DRMP/DEIS. Alternative C and E analyze the designation of all potential ACECs. The analysis in Section 4.4.2 of the Proposed RMP/Final EIS provides the rationale for designation of individual ACECs. Further discussion of rationale for designation or non-designation of ACECs will be provided in the ROD for the Price RMP.
159	The Draft EIS lacks a coherent analysis of the potential effects to various wildlife resources from oil and gas activities. Thus, it is difficult to assess whether the mitigation measures BLM proposes to impose to reduce any potential effects are necessary and supported by sound science.	Oil and Gas Best Management Practices, Conservation Measures for Special Status Species, and Measures Common to All Alternatives all include measures for protection of wildlife. Some measures have been developed through the experience of wildlife managers in the Federal agencies and others have been developed through academic research. The Proposed RMP/Final EIS provides a plan level analysis. More detailed analysis will be required for site-specific oil and gas proposals. Appendix G lists stipulations for surface disturbing activities along with exceptions, modifications, and waivers that can be applied as site-specific oil and gas activities are approved.
160	The Draft RMP/EIS does not provide for sufficient management and protection of the greater sage grouse or it provides too much protection of this species.	Several documents were published relative to greater sage-grouse and their habitat, after the Draft RMP/EIS was released for public comment. In June 2004, the Western Association of Fish and Wildlife Agencies (WAFWA) released the Conservation Assessment of Greater Sage-grouse and Sagebrush. The Proposed RMP complies with the greater sage-grouse and sagebrush habitat strategies, and would utilize suggested conservation measures to reduce the threats to not only greater sage-grouse populations and their habitats, but also to other sagebrush obligate species. In addition, the Proposed RMP includes goals, objectives and actions that would maintain or enhance the quality of existing sagebrush habitat, and would provide for rehabilitation or restoration of degraded or historic sagebrush rangelands. See Section 2.3 and Table 2-9 for a description of management actions for sage grouse under each of the alternatives. See GCR 55.
161	In order to meet its regulatory obligations, BLM should evaluate and implement the environmentally protective management prescriptions contained in Heart of the West.	Suggestions from the Heart of the West are incorporated into management where reasonable and compatible with BLM management practices. In addition, BLM supports multiple use of public lands in coordination with UDWR, USFWS and other federal, state and local organizations. Therefore, management of wildlife, habitat and other natural resources is balanced with the need for resource use throughout the field office.
162	The BLM must have an objective in the vegetation section regarding range land health standards and sagebrush steppe restoration as developed by Partners for Conservation and Development.	In the Proposed RMP/Final EIS, Section 2.3, Vegetation, specifically states that under all alternatives the BLM would use the Utah partners for Conservation and Development to identify sagebrush habitat locations and amounts that should undergo restoration and/or rehabilitation.
163	The analysis of impacts on vegetation in the Draft RMP/EIS is inadequate because it is inconsistent with management decisions in the alternatives or doesn't account for anticipated activities.	The impact analyses have been edited and clarified including the cumulative effects section in the Proposed RMP/Final EIS. The implementing regulations for NEPA require agencies to estimate the intensities of impacts to the human environment, as well as the resultant intensity based on the implementation of mitigation measures.

Organizations' Comments and Responses

Organization	Category	Comment	Response
Adventure Bound River Expeditions	Process and Procedures	The mere fact that the BLM went pseudo-public with this "proposal" less than a week ago is absurd. To set a time limit on feedback from the general population consisting of 7 days, at best, and that this time frame falls on a holiday week where the US Postal Service has a short work week... truly shows how concerned you really are with input and how important our voices and opinions really are.	Please see general comment response #145
Adventure Bound River Expeditions	Recreation	The contents of the "proposal" are extremely vague (that means unclear; indefinite; obscure; indistinct) on how the 90 motor trips per year are to be allocated... Your limited motor use "proposal" is bad for the river runners, both Commercial and private	Please see general comment response #34
Aircraft Owners and Pilots Association	Transportation and Access	Our specific concern is with the following language appearing in Chapter 2.10.1, Transportation and Motorized Access and elsewhere: Continue to use the following existing and currently used backcountry airstrips for noncommercial and limited commercial use. Extended commercial use would require a ROW purpose. Any closure of an existing airstrip would be done through consultation with the Federal Aviation Administration and the Utah Division of Aeronautics on a case by case basis: Peter's Point Mexican Mountain Cedar Mountain Hidden Splendor We believe that the above language raises the prospect of the closure of the area's remaining backcountry airstrips. AOPA strongly opposes the closure of these vital backcountry airstrips as a matter of safety. Backcountry airstrips play an essential safety role in America's national transportation network as emergency landing areas for transient aircraft. The availability of these airstrips could be the difference between a safe landing and an aircraft accident. Moreover, airstrips are regularly used by park service aircraft, firefighting aircraft, or aircraft engaged in search and rescue operations. It is critical that these airstrips remain open to use without restriction.	Please see general comment response #21
AKD Corp	Minerals and Energy Resources	As foreign oil supplies are reaching maximum productivity, it is imperative that all reasonable alternatives be included in the RMP to insure that the public needs for oil and natural gas supplies here at home are addressed as well as the need to protect the environment. Leaning too far to either side will have negative effects for years to come. Please review all viable alternatives to allow the exploration and development of our natural resources.	Please see general comment response #18
American Gas Association	Minerals and Energy Resources	The American Gas Association (AGA) appreciates the opportunity to comment on the Bureau of Land Management's (BLM) July 2004 Draft Resource Management Plan and Environmental Impact Statement for the Price Field Office and public lands in Carbon and Emery Counties dated July 16, 2004 (Price DRMP/EIS). AGA represents 192 local utility companies that deliver natural gas to more than 53 million homes, businesses and industries throughout the United States. AGA is an advocate for local natural gas utility companies. Natural gas meets one-fourth of the United States' energy needs and is the fastest growing major energy source. The Price DRMP/EIS is the first of seven draft plans that will be released over the next few years as part of a statewide plan revision initiative. The Price DRMP/EIS was prepared to provide direction for managing public	Please see general comment response #99

Organization	Category	Comment	Response
		lands within the Price Field Office and to analyze the environmental effects resulting from implementing the alternatives presented in the Draft. The purpose of this work is to update two significantly different and outdated plans into a single comprehensive RMP that is responsive to the many issues facing the Price Field Office jurisdiction. The draft plan addresses key public land issues, including, but not limited to, recreation, minerals and energy, soil and vegetation, and off-highway vehicle use. The Price DRMP/EIS was developed with input from four cooperating agencies, as well as input from the public. We will not comment on the technical details of the Alternatives evaluated in the Price DRMP/EIS. Instead, we discuss an important policy concern that we believe you should consider in the context of the alternatives presented in the plan. Nearly one-third of the United States is owned in common by its citizens, but is managed by BLM for divergent purposes including conservation of natural resources, recreation, resource extraction, and grazing. The Federal Land Policy and Management Act of 1976 (FLPMA) directs land managers to promote multiple use of federal lands in a manner that will ensure sustained yields from natural resources. The FLPMA requires land managers to balance the needs of the American public for open space and preservation, but also for natural resources that maintain and improve our quality of life. Multiple use management is a complicated task, requiring BLM to strike a balance among many competing uses to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.	
American Gas Association	Minerals and Energy Resources	Currently, one of our Nation's most pressing concerns is to reduce our reliance on foreign energy. The vast energy and mineral resources under BLM's jurisdiction gives the agency a natural and key role in ensuring that our country has an adequate supply of energy necessary for the safety and security of our families, our communities, and our Nation. These priorities can be met without diminishing the BLM's ability to manage other important interests. Within the context of the FLPMA, in the Price DRMP/EIS BLM's Field Office prepared different combinations of land management to address issues and resolve conflicts among uses. Among these 5 proposals, BLM prefers Alternative D, which provides for a wide variety of resource needs including maximizing mineral development potential in appropriate areas, while still providing quality recreation settings and benefits.	Please see general comment response #18, #49 and #52
American Gas Association	Minerals and Energy Resources	AGA believes that BLM's preferred alternative is a step in the right direction for the public lands in Carbon and Emery Counties and incorporates an important policy initiative, is consistent with the Energy Policy and Conservation Act Reauthorization of 2000 (which calls for modifying or removing impediments to federal gas leasing when appropriate), and addresses the increased demand for energy as balanced against the need for protection of other resources. AGA believes that Alternative D, by allowing for an increase in the number of wells per year and the number of acres available natural gas leasing, exhibits an appreciation of the adverse impact restrictions on natural gas development can have on natural gas supply and prices. Nonetheless, Alternative D does not provide the most acreage for natural gas leasing. Alternative A, which calls for mineral resources development primacy over other uses and resource consideration, allows for an additional number of acres for leasing. This would be even more appropriate given the current demands for energy. Indeed, according to BLM's own figures, oil and gas leasing in Utah has dropped off compared to the 1980s. Only 4 million of the 18 million acres in the state available for oil and gas development are currently under lease, compared to 16 million acres under lease during the 1980s.	Please see general comment response #18

Organization	Category	Comment	Response
		Alternatives A and D, while opening up currently unavailable acreage to leasing, still do not create a situation such as existed in the 1980s.	
American Rivers, Inc.	Process and Procedures	The ultimate determination of whether the river is "suitable" for designation should rest with the U.S. Congress. While "suitability" is mentioned in the Act (article 5(d)), it is not defined, and there is no mention of "suitability" in the Interior Department's regulations published in the Federal Register on September 7, 1982. The gloss of an extensive "suitability" analysis was apparently added only later, perhaps only to reduce the number of rivers potentially available for designation. If suitability is going to be used to knock out of contention for designation a wide array of rivers that are free-flowing and have "outstandingly remarkable values," we have doubts as to whether this practice is consistent with the Congressional declaration of purpose in the Act.	As stated in BLM's Wild and Scenic Rivers policy and program manual (Manual 8351, 1993), all river segments that have been identified as being eligible are further evaluated in the RMP process to assess whether or not they would be suitable for inclusion in the National Wild and Scenic River System. As stated in (Manual 8351 .33A): "In most cases, BLM will assess river suitability in the RMP process and document the tentative classification of the appropriate segment(s) (wild, scenic, and/or recreational). Should a suitability determination have to be deferred on any eligible river where the BLM has administrative jurisdiction, the RMP must prescribe protective management measures to ensure protection shall be afforded the river and adjacent public land area pending the suitability determination and, when necessary, subsequent action by the Congress." Under the Proposed RMP only 5 eligible river segments would be found suitable, but protective management would apply to BLM lands along suitable river segments with 62 miles tentatively classified as Wild, 60 miles Scenic, and 8 miles Recreational. The protected rivers are shown on Map 2-52 in the Proposed RMP/Final EIS. Also see general comment response #25.
American Rivers, Inc.	Wild and Scenic Rivers	Alternative D only finds 223 river miles on only two rivers suitable for designation into the National System. This is less than one-third of the eligible river miles of Alternative C. As indicated at pages 2-132-133 of the Draft EIS, this adverse judgment denies the full spectrum of interim river protection to a substantial amount of eligible rivers and river mileage in the Price field region. This is most unfortunate. These rivers deserve the full spectrum of interim protection available under BLM's Organic Act, while recognizing that they will not receive the additional protections available under the Wild and Scenic Rivers Act unless and until they are designated by Congress into the National System.	Suitability considerations for each stream are fully disclosed in Appendix C of the Proposed RMP/Final EIS and include other means of protecting river values. Management of rivers not found suitable will be according to the management prescriptions selected in the Record of Decision for the RMP upon completion of the Final EIS. Some of the management prescriptions for non-suitable rivers in the Proposed RMP are protective in nature; eg, VRM Class I for the San Rafael River, protection for riparian areas, etc.
American Rivers, Inc.	Wild and Scenic Rivers	We are concerned about how the suitability studies were conducted. Seven suitability factors were considered for each river, and "notes" were provided in Appendix 3 for most of these factors for each river segment. But the basis for the rejection of suitability is clear in only two cases, Fish Creek and Gordon Creek (limited amount of federal land in the corridor makes federal management impractical). Several other river segments have resource	Please see general comment response #25

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		use conflicts due to the presence of OHV trails, and opposition to suitability from state and local governments is common to all alternatives, including the two rivers the Price Field Office deems suitable. But nowhere do the EIS documents indicate how BLM evaluated these factors and proceeded to a final determination. Thus the RMP and EIS suitability determinations are not supported by substantial evidence on the record. While the seven suitability factors were considered in the impact analysis, additional important considerations were not included. This includes, among other things, the contributions of the river segment to the river system or basin integrity, reflecting the benefits of a “systems” approach. The interagency Wild and Scenic Rivers Coordinating Council stated in a document explaining how the study process should be conducted that benefits arise from this approach, indicating that including the headwaters and tributaries of many of these rivers is important. (Study Paper, p. 18.)	
American Rivers, Inc.	Wild and Scenic Rivers	The discussion of Alternatives in Section 2 of the document and in Appendix 3 of the RMP/EIS determination does not describe how or why the tentative classifications of the river segments were changed between alternative plans. For example, it is unclear how the same sections of the Green River were classified as “wild” in alternatives B and C, but “scenic” in alternatives A and D. By reducing classifications among the rivers, there seems to be political gloss on what under the clear language of the Act is solely a physical and geographic assessment. Appendix 3 of the RMP states “each river segment is given one of three tentative classifications – wild, scenic, or recreational – based on the degree of development.” (App. 3, p. 1.) These developmental factors include water resources development, shoreline development, accessibility, and water quality. Suitability, on the other hand, “provides the basis for determining whether to recommend a river as part of the National System.” Altering the tentative classifications is not mentioned as a part of the suitability process in the Interagency Wild and Scenic River Study Process paper cited above. Indeed, the paper notes that “eliminating a river from consideration due only to controversy usually does not resolve the issue.” And the key federal land managing agencies do not appear to have a uniform practice in this regard. Taken together, this implies that tentative classifications should be based upon how developed the areas are and how outstanding the river segment’s values are, and that suitability determines only whether or not it should be included in the system. If a river’s eligibility is “wild,” than that is where the river ought to be in suitability as well. BLM should be protecting the river’s values that led it to be initially classified as “wild,” not demoting the classification to mend political controversy or protect future development prospects.	Please see general comment response #148
American Rivers, Inc.	Wild and Scenic Rivers	None of the river segments found suitable in Alternative D is designated “wild,” leaving out significant river protections, such that, for example, the Green River will be given interim protection only under a less rigorous standard. This is inexplicable for a river of the merits of the Green River	Please see general comment response #148
American Rivers, Inc.	Wild and Scenic Rivers	The ultimate determination of whether the river is "suitable" for designation should rest with the U.S. Congress. While "suitability" is mentioned in the Act (article 5(d)), it is not defined, and there is no mention of "suitability" in the Interior Department's regulations published in the Federal Register on September 7, 1982. The gloss of an extensive "suitability" analysis was apparently added only later, perhaps only to reduce the number of rivers potentially available for designation. If suitability is going to be used to knock out of contention for designation a wide array of rivers that are free-flowing and have "outstandingly remarkable values," we have doubts as to whether this practice is consistent with the Congressional declaration of purpose in the Act.	The referenced September 7, 1982 Department of the Interior and Department of Agriculture guidelines may not use the term "suitability," but does provide for suitability-type analyses as part of the Wild and Scenic River study process. This involves consideration of alternative uses of the river area, alternative protective measures, and alternative classifications. BLM Washington Office Manual 8351 provides further guidance. Section

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			8351.33 of the manual directs BLM to make a determination of suitability stating, "Each eligible river segment is further evaluated in the RMP process to assess whether or not it would be suitable for inclusion in the [national system of Wild and Scenic Rivers]. The planning determination of suitability provides the basis for any decision to recommend legislation." See general comment response #25.
Americans for Freedom On Public Lands	Transportation and Access	We are very opposed to your plan of closing any portion of the 3500 miles of road to motorized vehicle travel! When you get older you will understand, that is unless you persist in the belief that the elderly should be prejudiced against even when you are one of them. It is ridiculous that you should close roads for a few and exclude the many... We hope you will reconsider your plan.	Please see general comment responses #10 and #80
Anadarko Petroleum Corp	Wildlife and Fish	The draft EIS lacks a coherent analysis of the potential effects to various wildlife and natural resources from oil and gas activities. Thus, it is difficult to assess whether the mitigation measures BLM proposes to impose to reduce any potential effects are necessary and supported by sound science.	Please see general comment response #159
Anadarko Petroleum Corporation	Livestock Grazing	Section 4.2.2 identifies projects that have the greatest likelihood to generate potential cumulative impacts "when added to the Price RMP alternatives". EIS at 4-4. This section fails to include two general categories of projects - grazing and off highway vehicle (OHV) use - that will likely generate potential cumulative impacts.	The Draft RMP/EIS and Proposed RMP/Final EIS consider and analyzes management decisions for livestock grazing and OHV use within the Price FO. As such, the impacts of these decisions are included in the cumulative impact analysis. Such inclusion is acknowledged with the phrase "...when added to the Price RMP alternatives."
Anadarko Petroleum Corporation	Minerals and Energy Resources	BLM must also ensure that the science exists to support the imposition of any restrictions. Regrettably, the EIS lacks sufficient and specific information on the potential effects to wildlife and other natural resources from the types of disturbances that would be expected from oil and gas activities and other activities such as grazing rendering a meaningful analysis of the potential impacts impossible. Because the impacts can not be adequately assessed, we do not believe BLM has disclosed sufficient information to support the imposition of measures to mitigate any potential impacts... APC is also concerned with the absence of an analysis of the effects various restrictions imposed upon the oil and gas industry would have on total recoverable hydrocarbons. Specifically, APC request that the BLM revise the EIS to include a discussion of how the imposition of a requirement for directional drilling, imposition of Class II and III VRM restrictions and new or expanded special management areas, such as areas of critical environmental concern would have on available resources. For example, if directional drilling is required, the increased cost of directional drilling may render many pays that would otherwise be economic to develop uneconomic with the concomitant loss of the oil and gas resources... Another example of a statement lacking an analytical foundation occurs on page 4-13. Under the discussion of cumulative impacts from Alternative A, it states: Impacts associated with this increased activity include fragmentation and loss of dear and elk habitats, changes to vegetation cover, potential indirect loss of Special Status Species habitat, the great amount of water diversion from streams, and increased air emissions." First, the document contains absolutely no supporting analysis substantiating these assertions. Second, the assertion that there would be increased air emissions is contradicted by the statement on page 4-17 that "there are no reasonably foreseeable actions by the BLM or activities on BLM lands in the field office that would negatively affect air	Additional analysis of impacts from mineral exploration and development has been included in the Proposed RMP/Final EIS. The stipulations were designed to mitigate impacts identified in the analysis of environmental consequences. The analysis of impacts on mineral and energy production has also been expanded.

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		quality." BLM needs to revise the document to contain, at a minimum, a discussion of the information supporting such a broad statement... In this same section under the significance criteria, the EIS states that "Voluntary mitigation activities will occur when a cumulative loss of 10 acres or more occurs" (emphasis added). EIS at 4-155 to 156. First, this is a potential mitigation measure, and it should not be included in this section. Second, it is internally inconsistent. A measure can not be "voluntary" if BLM is mandating that it be done under certain conditions. To correct this inconsistency, BLM should strike the sentence and replace it with the following: "BLM and the applicant would consider off-site mitigation as an option to mitigate impacts to crucial habitat from an individual project if such a project results in a cumulative loss of 10 or more acres." The EIS in the context of oil and gas leasing in the Nine Mile Canyon ACEC which will be subject to a non-surface occupancy stipulations states; "access to oil and gas resources within the ACEC would be available from non-BLM lands within the area as negotiated with land owners." EIS at 4-526. First, this statement assumes that adjacent landowners will be willing to provide access to their lands such that BLM's minerals can be developed. This is not necessarily true. Second, the document fails to account for the fact that the additional costs imposed by gaining access to the adjacent land may render development of the federal minerals uneconomic. Or, a potential developer, given the uncertainty in being able to obtain such rights, may decide not to invest in such a lease in the first place. BLM should revise the document to account for these issues.	
Anadarko Petroleum Corporation	Process and Procedures	The EIS also states that "[o]ther potential future actions have been considered and eliminated from further analysis because there is only a small likelihood of these actions being pursued... The document fails to discuss in even a cursory fashion what potential future actions were considered and eliminated. Thus, no independent analysis of this statement is possible.	Section 2.2.7 in the Proposed RMP/Final EIS fully discussed other management options that were considered but eliminated from detailed analysis. Each option is described and the rationale for not analyzing it further are provided.
Anadarko Petroleum Corporation	Process and Procedures	At this time, APC cannot support any of the alternatives proposed in the DRMP, because of what we consider to be critical deficiencies in the analyses of the potential impacts of the proposed alternatives in the EIS. Moreover, because of the extensive nature of the deficiencies, we believe BLM should re-write the document to correct the deficiencies and to present the information in a more readable format. The document should then be re-issued for public comment. Moreover, the presentation of the material in the tabular form is unwieldy. Although tables are useful in a document of this type for quick comparisons, the use of tables here is unworkable. We recommend BLM redraft the document to present the information in a more workable format.	Please see general comment responses #92 and #143
Anadarko Petroleum Corporation	Process and Procedures	APC believes it is fundamentally important to the nation's economic well being that BLM recognize the importance of developing oil and gas resources while providing protections for other resource concerns. To this end, the BLM should ensure that it limits restrictions on oil and gas exploration and development activities to those that are the least restrictive yet still maintain the necessary protection of other resources. However, it is impossible to determine if this is the case since BLM failed to provide any meaningful analysis in the document	Please see general comment response #2
Anadarko Petroleum Corporation	Wildlife and Fish	BLM proposes to employ a restriction identified as "special stipulation" for mule, deer, and elk in "substantial" or "limited" value habitats. (Appendix 8). Unfortunately, APC was unable to find sufficient rational in the document to support its imposition nor were we able to identify the nature of the special stipulations. Additional examples of a lack of supporting data and analysis can be found with respect to the measures BLM proposes to impose to protect sage grouse and their habitats. On page 4-443 of the EIS, it states that: "Wildlife would be directly impacted through the loss and fragmentation of crucial and high-value winter habitats, potentially causing displacement, avoidance of some areas, a reduction of habitat-carrying capacity, resulting in population declines in many wildlife species." While this statement may be true, the EIS does not contain any readily identifiable supporting information or documentation. There is no discernable discussion of the degree to which the resulting	Please see general comment response #43

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		habitat effectiveness differs between alternatives, the types of activities occurring (drilling versus production) and their specific impacts on habitats, whether displacement is permanent or temporary, the ability of sage grouse to habitate, whether sage grouse would relocate to other suitable habitats, etc... the EIS lacks a coherent analysis of the potential effects to various wildlife and natural resources from oil and gas activities. Thus, it is difficult, at best, to assess whether the mitigation measures BLM proposes to impose to reduce any potential effects are necessary and supported by sound science... On page 4-155 the EIS identifies the assumptions employed to conduct the analysis on impacts to fish and wildlife. First, the assumptions are not supported by any analysis. The listing of the assumptions without any discussion is not sufficient to satisfy the requirements of the National Environmental Policy Act. Moreover, these assumptions are not supported by the information provided in Chapter 3 as that chapter largely contains conclusory statements without any supporting citations to studies or scientific literature. Second, these assumptions do not contain sufficient information to provide sufficient basis to support either the development of or implementation of the stipulations contained in the document. For instance, this section states that, "Raptors will abandon active nest sites if disturbance occurs during the nesting season." EIS at 4-155. This conclusory statement is not supported by any cites to studies or literature. Nor, do the references cited in Chapter 8 appear to contain any supporting documentation. This statement without any analysis renders it impossible to determine the extent or degree of disturbance at which abandonment occurs. How close to the nest does disturbance have to occur to cause abandonment? Will casual use cause abandonment? Do buffer zones need to be equal for all species of raptors? Other statements in this section are equally deficient (e.g. Sage grouse breeding and nesting activities disrupted by human activity). Without answers to these questions, it is difficult to determine whether the measures is necessary.	
Anadarko Petroleum Corporation	Wildlife and Fish	Under Alternative D for breeding habitats for neo-tropical birds, BLM proposes to impose a "no permitted surface occupancy" restriction on oil and gas activity. APC has a number of concerns with this proposed limitation. Although APC understands and supports BLM's efforts to identify and protect sensitive species as identified in Appendix 4, we do object to the imposition of restrictions, absent a detailed analysis of the impacts to the oil and gas industry, particularly when tied to such a broad category of wildlife that could potentially occur almost anywhere within the Price FO. Finally, APC is unable to identify a map or other information pertaining to the total amount of acreage affected by this measure.	The proposed plan is not as restrictive for migratory birds as Alternative D in the Draft RMP/EIS.
Anadarko Petroleum Corporation	Wildlife and Fish	APC suggests BLM revise the document to identify and discuss the science (i.e. cause and effect relationship) and rationale utilized to develop stipulations/restrictions... First, it is completely unclear what is meant by "Special Stipulation" that appears in a number of the columns. BLM should revise the document to clarify what it means. Second, we again note that the document is devoid of any clear analysis supporting the imposition of these measures and the limitations on their imposition as noted at the beginning of the document.	The term "Special Stipulation" refers to stipulations added to the standard stipulations for protection of valuable resources or uses. The term "special stipulation" has been removed and a definition of stipulations placed in the Glossary. The stipulations were designed to mitigate impacts identified in the analysis of environmental consequences.
Anadarko Petroleum Corporation	Wildlife and Fish	Finally, under Alternative D for certain Mule Deer/Elk/Bighorn Sheep habitats it appears that off-site mitigation to the extent prescribed is mandatory. This is in direct conflict with other language in the document that seeks to utilize offsite mitigation as a voluntary measure (Page 4-88 and 91). APC strongly believes off-site mitigation should not be imposed as a mandatory measure particularly in the absence of any detailed analysis justifying such a measure. APC recommends that BLM clarify throughout the document that offsite mitigation will only be considered in those instances where it is proposed by the operator...	Please see general comment response #43

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Anadarko Petroleum Corporation	Wildlife and Fish	It is impossible for a reader to determine the nature of the constraints placed on white tailed prairie dogs under any of the alternatives or even to make sense of the information presented in the table. First, white tailed prairie dogs are listed twice with no apparent difference yet there are different seasonal restrictions and surface use restrictions. Second, under the heading of season of use it states "colonies." A colony is not a season nor does it relate to a season of use. Third, under season restrictions for the first listing it states March 1st to July 1st, while the second listing has no such restriction. Fourth, the first listing does not restrict surface occupancy while the second does. Finally, under Alternative C it states "special stipulation" while Alternative D requires no surface occupancy. There is no discernable explanation for these differences. These entries need to be revised to clarify why they are being imposed and for what time period.	Rationale for constraints placed on white-tailed prairie dog under the alternatives has been added.
Anadarko Petroleum Corporation	Wildlife and Fish	In addition, Appendix 8 appears to identify both timing and surface avoidance strategies to protect sage grouse. Beyond that it is impossible to determine which one will be applied under Alternatives A, B and C. Alternative D shows consistency in that it requires "no surface occupancy" under either a timing or surface avoidance strategy, however, the document does not identify the conditions under which the restrictions would be imposed (i.e. prairie dog colonies above a certain size, burrow density, total restricted acreage in the PFO, etc.). Again, this table needs to be revised to provide more explanation for the entries. In addition, the document does not contain any readily apparent analysis of the potential impact of the imposition of these measures on the oil and gas industry. But, we do not believe such an analysis could be conducted without defining the parameters more clearly.	Please see general comment response #41
ARARA Conservation Committee	Cultural Resources	After careful perusal of Appendix 5, Objectives for Cultural Resource Management, I find that there is one area of cultural resources that has been overlooked, rock art. I do realize that rock art falls under the broad category of archeological resources, but it's value is fragile and finite. Looking at the location aspects of rock art alone, without factoring in any other variables, the fact is that most rock art is above ground and vulnerable to weather related elements, along with human acts of vandalism. In addition, rock art itself presents a from of ethnography, where no other exists in the cultural region. Its preservation is of the utmost urgency, before these resources vanish forever. We would like to offer the following suggestions which might be helpful to include in the Management Plan for the Price Field Office. We would like to see a specific plan incorporated into the management plan regarding the thorough recording and documentation of rock art sites within the Price Field Office area. I am of the understanding that the BLM does not have a standard procedure in place for recording rock art sites, and if this is still correct, ARARA would be able to assist in this area. the potential problems that exist within this situation need to be addressed. We would like to suggest that the BLM establish a volunteer monitoring program for the rock art sites contained within the district, staffed by volunteers who are trained in the proper care of rock art resources.	Please see general comment response #9
Arch Coal and Subsidiary Canyon Fuel Company	Minerals and Energy Resources	Utah utilities are highly dependent on using Utah coal. Most of the utilities that consume coal in Utah do not have ready access to rail service; so seeking a source of coal elsewhere is logistically difficult, if not impossible. Loss of the ability to extract Utah coal would result in significant impact to electricity generation and the resulting cost to the consumer. Utah has some of the highest quality coal in the United States. It is very high in Btu content and very low in sulfur content. The current Administration is working towards developing a plan to reduce mercury emission from coal-	Please see general comment response #18. Section 4.2.1 in Chapter 4 of the Proposed RMP/Final EIS provides details on assumptions related to coal mining.

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		fired power plants. Utah coal has some of the lowest mercury content of any coal produced in the United States.	
Arch Coal and Subsidiary Canyon Fuel Company	Socioeconomics	With its long and storied history, and demonstrated success of operating in an environmentally responsible fashion on Forest Service and BLM lands, it is not necessary or desirable to declare the coalfields off limits. This outcome would cause electric rates in Utah to rise significantly, impacting economic competitiveness and development. It would also harm the local economies that are dependent on the Utah coal industry for primary and secondary jobs.	The comment provides no information on which coal fields are being placed "off limits" in the DEIS. The proposed RMP would not place any additional coal fields off limits for leasing and development.
Arch Coal and Subsidiary Canyon Fuel Company	Wilderness	BLM notes the presence of 11 Wilderness Study Areas (WSA) with the Price Field Office area, including Desolation Canyon, Turtle Canyon, Jack Canyon, Muddy Creek, Sids Mountain, Devils Canyon, Crack Canyon, San Rafael Reef, Horseshoe Canyon (North), Mexican Mountain and Link Flats ISA. The DEIS correctly notes that these WSAs cannot become Wilderness Areas without Congressional Action. The DEIS also notes that none of these WSAs would be impacted by coal mining, either by existing mining operations, or under the reasonable foreseeable development analysis. It is important that the BLM restrict the consideration of WSAs to those listed above. The Manti-LaSal National Forest, as part of their Forest Planning Process, is currently trying to evaluate roadless areas for wilderness potential: http://www.fs.fed.us/r4/mantilasal/projects/projects%20forest%20plan/forest%20plan%20pub%20involve.shtml	Please see general comment response #114
Archaeological Legacy Institute	Cultural Resources	The bottom and sides of Nine Mile Canyon must be protected from oil and gas drilling. This is important for this and future generations of Americans. The cultural resources there are far more valuable over the long term than any amount of oil and gas that might be found. This is important to the local community there as well, including the school kids. To see how they feel about it, please go to the video posted on The Archaeology Channel at htttp://www.archaeologychannel.org/content/video/NineMileCanyon.html. Nine Mile Canyon is a special place. Please keep it that way.	Please see general comment response #9
Arizona Wilderness Coalition	Minerals and Energy Resources	Arizona Wilderness Coalition asks BLM to ban all forms of mineral leasing in all the lands proposed for designation as wilderness in America's Redrock Wilderness Act. Under the draft plan close to one million acres would be open to leasing, including almost all of the proposed wilderness that is not in WSAs. The 584,000 acres that is closed to leasing in the draft is almost entirely in WSAs, which are already closed to mineral leasing by section 603(c) of FLPMA. The leasing question is more complicated than it appears at first glance. Once the proposed wilderness lands are leased, there would be multiple companies with an incentive to oppose wilderness for every acre. Then if Congress designates those acres as wilderness, the lessees would be back, demanding compensation or an exchange-out. It is safer not to lease in those areas until Congress has made a decision, because you avoid any degradation of wilderness values and you save the government time and money.	Please see general comment responses #18 and #36
Arizona Wilderness Coalition	OHV Route Identification	We ask BLM to exclude ORVs from all areas proposed for wilderness in America's Redrock Wilderness Act. ORV traffic has burgeoned all over the West, and it is doing damage month by month, grinding down wilderness values. BLM should remember its mandate in FLPMA to "prevent unnecessary or undue degradation of the lands and resources." The damage created by ORVs clearly is degradation, and it is neither necessary nor due. The draft plan is deficient in more than one respect. It does not even close the section 603 WSAs, leaving large parts of WSAs open. In some "closed" WSAs, long and unnecessary routes have been left open into the middle of the WSA in the form of a cherrystem. These routes serve as continuing sources of impacts that will be difficult and costly to reclaim. They should be closed.	Please see general comment responses #12 and #36

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		More generally, we urge BLM to adopt a travel plan to accompany the Price RMP. That plan should allow ORVs only on routes that are established and necessary, and that do not enter sensitive or pristine lands within the proposed wilderness areas. Of course, no routes should be open that cause impacts against aquatic and riparian habitats, such as those running in streambeds, crossing streams, or damaging riparian vegetation. Duplicate or parallel routes should be closed. A determination of public necessity should be required of any route designated as open to ORVs.	
Arizona Wilderness Coalition	Wilderness	The Price draft plan omits consideration of wilderness designation as an option for any lands beyond the Wilderness Study Areas previously identified under section 603 of the Federal Land Policy and Management Act (FLPMA). We are all too aware that this is being done under Secretary Norton's policy pursuant to the "settlement" with the state of Utah. We believe that is wrong, because BLM has a continuing obligation under sections 201 and 202 of FLPMA to consider wilderness in its inventory and planning efforts. Wilderness should be a strong element of the Price RMP because you have 1.5 million acres that has been proposed for designation as wilderness in America's Redrock Wilderness Act (S. 639, H.R. 1796). Breaking down that acreage, 531,000 acres is in WSAs, 531,000 was in BLM Wilderness Inventory Areas dropped under Secretary Norton's policy, 323,000 acres was determined by BLM to have a "reasonable probability" of having wilderness quality, and 155,000 acres was found by citizen proponents to have wilderness characteristics. Protecting Wilderness Values: Directives issued by the BLM Director under the Norton policy made clear that field officials have ample authority to protect wilderness values under other terminology. Arizona Wilderness Coalition has a continuing dialogue with the Arizona State Director concerning the use of that authority. In contrast to our experience, the Price draft RMP does not make use of that authority. The draft contemplates mineral leasing on 98 percent of the wilderness quality lands outside of the section 603 WSAs. It leaves off-road vehicles free to impose more damage on the land, both in WSAs and in other proposed wilderness units. The plan needs to be seriously strengthened to guard against damage from these destructive uses.	Please see general comment responses #36 and #108
ATVA	OHV Route Identification	I recent received an e-mail that stated the many or most of the existing OHV routes inventory in the San Rafael Swell were not taken into consideration and will not be included in the current Draft EIS. I hope this is not the case and if it is, I hope a correction will be made.	Please see general comment responses #20 and #31
Berco Resources	Minerals and Energy Resources	The Bureau of Land Management in general throughout the Rocky Mountain Region is imposing too many restrictions (e.g. wildlife crucial winter range or migration corridor) based upon environmental extremists' opinions and concerns that are not supported by scientific data. There should be room for compromise (i.e. limited activity).	Please see general comment response #18
Bill Barrett Corporation	Minerals and Energy Resources	In summary, it appears that BLM did not recognize the great potential for oil and gas development in this portion of the Uinta Basin nor the socioeconomic impact that the proposed environmental protection measures would have on the public interest. At the root of the failure to recognize oil and gas potential is the fact that the Mineral Potential Report did not adequately characterize the potential and importance of the area with regards to meeting energy demand. The Reasonable Foreseeable Development Scenario (RFD), which is based in part on the conclusions of the Minerals Potential report, understates the level of development that the area is likely to be experience. As a consequence, no alternative that describes full development was analyzed. In fact, it appears that the alternatives are largely combinations of restrictions to activity rather than a range of the activity itself.	Please see general comment responses #18, and #53

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Bill Barrett Corporation	Minerals and Energy Resources	Mineral Potential Report:: The northern portions of the Planning Area are receiving increased levels of attention as a result of higher commodity prices, improvements in technology that allows extraction of oil and gas resources that were previously uneconomic and better access to markets through a expansion of intra and interstate natural gas pipelines. The Uinta Basin is widely recognized to contain huge reserves of oil and natural gas and will be the sharp focus of oil and gas exploration efforts in the coming decades. As mentioned above, BBC holds leases to over 80,000 acres in the Price Resource Area. With regards to the Stone Cabin Area in particular, the Mineral Potential Report failed to recognize the continuous nature of this accumulation, the fact that multiple horizons are productive (the Wasatch and Paleozoic section in addition to the Mesa Verde) and the fact that greater well densities that 80 acres will be necessary to recover the natural gas resource. BBC will in fact propose 40 acre well density over a broad area centered on the Stone Cabin Field when it is appropriate to develop an RFD for field development. The Mineral Potential Report also misses plays that have been identified by the USGS, and does not recognize that the interest in development that is expressed though leasing and nominations. Furthermore, leasing activity itself has been restricted by BLM policy, that is, leases that are nominated often are not made available for lease. Therefore, even this indicator understates the true industry interest.	Please see general comment response #53
Bill Barrett Corporation	Minerals and Energy Resources	RFD: With regard to the Stone Cabin Field in particular, when it is appropriate to develop an RFD for field development, BBC will propose 40 acre well density for the Mesa Verde. BBC will also propose to drill wells to the Wasatch and the deeper Paleozoic horizons. We estimate at this time that the RFD for this project alone will include over 1000 wells versus 600 as described in the current RFD. The RMP RFD must include wells for prospects that have yet to be identified. The USGS rightly recognizes the high potential for Coal Bed Methane and conventional oil and gas resources but the RFD includes few (apparently 240 wells) for all areas outside of identified prospects. It is very likely and reasonably foreseeable that a new field or fields requiring many hundreds of wells to develop will be discovered. BBC believes that rather than attempt to predict a precise well count, it would be proper and more informative to the public to enumerate the potential in each play and describe the factors that could limit each, and provide a range of potential development in the RFD. At a minimum, BLM should revise the RFD to include at least 3,000 wells. BLM must then develop and analyze a range of alternatives that comprises full development while accomplishing management objectives for other resources.	Please see general comment responses #48 and #53
Bill Barrett Corporation	Minerals and Energy Resources	Environmental Stipulations: In its preferred alternative, the Stone Cabin Field, an area of known productivity of oil and gas, BLM imposes the combined burdens of an ACEC, unachievable VRM objectives, a Special Recreation Management Area, closes areas to leasing, imposes NSO, and numerous wildlife and other timing limitations. If the preferred alternative were to be adopted, development will be impossible over much of the field. These limitations are proposed despite the fact that oil and gas development has coexisted with the resources that BLM seeks to protect for over 50 years. Clearly, what is proposed is not the least restrictive management necessary to protect the resource. BLM policy is to impose these restrictions on existing leases in addition to any new leases. BBC is not familiar with the entire resource area, but we expect based on our experience with the Price office, that this pattern is repeated for other areas and other extractive resources. Again, alternatives must developed and analyzed that protect resources without the prohibitive prescriptions now proposed.	Please see general comment responses #18, #48, #51 and #53
Bill Barrett Corporation	Minerals and Energy	Directional Drilling: BLM cannot simply presume that directional drilling will allow development in the hostile	Please see general comment responses #16, ,

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	Resources	regulatory environment offered by the draft RMP. These determinations must be made on a site specific basis. Furthermore, the RMP must be flexible enough to allow and promote adoption of new technologies as they evolve. BLM should state objectives and manage them rather than simply prescribe restrictions that may not be necessary in the future with the advent of new technology. Summary: Although the RMP was initiated by BLM because of concerns that the existing planning document did not adequately consider potential levels of oil and gas activity that are reasonably foreseen for the area, the BLM drafted a plan that goes out of its way to stifle that very development. If implemented, this plan will, without significant demonstrable environmental benefit, dramatically impact BBC's ability to develop its lease rights, as well as the local, state, and national economy. BLM must reconsider the RFD, redraft technically feasible alternatives around management objectives, analyze those alternatives, including a valid socioeconomic impact analysis, and select the alternative that best balances the environment and development. BBC stands ready to support genuine BLM efforts to develop a redraft.	#118, #132, #133, #143 and #154
Bill Barrett Corporation	Minerals and Energy Resources	The northern portions of the Planning Area are receiving increased levels of attention as a result of higher commodity prices, improvements in technology that allows extraction of oil and gas resources that were previously uneconomic and better access to markets through a expansion of intra and interstate natural gas pipelines. The Uinta Basis is widely recognized to contain huge reserves of oil and natural gas and will be the sharp focus of oil and gas exploration efforts in the coming decades. As mentioned above, BBC holds leases to over 80,000 acres in the Price Resource Area. With regards to the Stone Cabin Area in particular, the Mineral Potential Report failed to recognize the continuous nature of this accumulation, the fact that multiple horizons are productive (the Wasatch and Paleozoic section in addition to the Mesa Verde) and the fact that greater well densities that 80 acres will be necessary to recover the natural gas resource. BBC will in fact propose 40 acre well density over a broad area centered on the Stone Cabin Field when it is appropriate to develop an RFD for field development. The Mineral Potential Report also misses plays that have been identified by the USGS, and does not recognize that the interest in development that is expressed though leasing and nominations. Furthermore, leasing activity itself has been restricted by BLM policy, that is, leases that are nominated often are not made available for lease. Therefore, even this indicator understates the true industry interest. With regard to the Stone Cabin Field in particular, when it is appropriate to develop an RFD for field development, BBC will propose 40 acre well density for the Mesa Verde. BBC will also propose to drill wells to the Wasatch and the deeper Paleozoic horizons. We estimate at this time that the RFD for this project alone will include over 1000 wells versus 600 as described in the current RFD.	Please see general comment response #53
Bill Barrett Corporation	Minerals and Energy Resources	The RMP RFD must include wells for prospects that have yet to be identified. The USGS rightly recognizes the high potential for Coal Bed Methane and conventional oil and gas resources but the RFD includes few (apparently 240 wells) for all areas outside of identified prospects. It is very likely and reasonably foreseeable that a new field or fields requiring many hundreds of wells to develop will be discovered. BBC believes that rather than attempt to predict a precise well count, it would be proper and more informative to the public to enumerate the potential in each play and describe the factors that could limit each, and provide a range of potential development in the RFD. At a minimum, BLM should revise the RFD to include at least 3,000 wells, BLM must then develop and analyze a range of alternatives that comprises full development while	The RFD for the number of wells that will be drilled is the BLM's best estimate of what will occur in the future. This number can change widely due to factors which cannot be accurately determined. Examples of these factors are the price of oil and gas, the success or failure of exploration in unproven areas, the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. The numbers of wells that

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		accomplishing management objectives for other resources.	will be drilled in the future are not set by the RFD, but the RFD is used to analyze the potential impacts of future drilling activities. Appendix M of the Proposed RMP/Final EIS includes an RFD for each of the alternatives analyzed in detail based on the collective decisions and mitigating measures for each alternative. See general comment responses #48 and #53.
Bill Barrett Corporation	Minerals and Energy Resources	In its preferred alternative, the Stone Cabin Field, an area of known productivity of oil and gas, BLM imposes the combined burdens of an ACEC, unachievable VRM objectives, a Special Recreation Management Area, closes areas to leasing, imposes NSO, and numerous wildlife and other timing limitations. If the preferred alternative were to be adopted, development would be impossible over much of the field. These limitations are proposed despite the fact that oil and gas development has coexisted with the resources that BLM seeks to protect for over 50 years. Clearly, what is proposed is not the least restrictive management necessary to protect the resource. BLM policy is to impose these restrictions on existing leases in addition to any new leases. BBC is not familiar with the entire resource area, but we expect based on our experience with the Price office, that this pattern is repeated for other areas and other extractive resources. Again, alternatives must developed and analyzed that protect resources without the prohibitive prescriptions now proposed.	Please see general comment response #18 and #110
Bill Barrett Corporation	Minerals and Energy Resources	Although the RMP was initiated by BLM because of concerns that the existing planning document did not adequately consider potential levels of oil and gas activity that are reasonably foreseen for the area, the BLM drafted a plan that goes out of its way to stifle that very development. If implemented, this plan will, without significant demonstrable environmental benefit, dramatically impact BBC's ability to develop its lease rights, as well as the local, state, and national economy. BLM must reconsider the RFD, redraft technically feasible alternatives around management objectives, analyze those alternatives, including a valid socioeconomic impact analysis, and select the alternative that best balances the environment and development. BBC stands ready to support genuine BLM efforts to develop a redraft.	Please see general comment responses #18 and #143.
Bill Barrett Corporation	Minerals and Energy Resources	BLM also supposes in its analysis that directional drilling will allow development of the subsurface minerals beneath areas that are subject to No Surface Occupancy or VRM restrictions. This presumption is unsupported.	Please see general comment response #16
Bill Barrett Corporation	Process and Procedures	No alternative that describes full development was analyzed. In fact, it appears that the alternatives are largely combinations of restrictions to activity rather than a range of the activity itself. The analysis that was conducted is also fatally flawed with respect to the socioeconomic impact analysis. That is, even if BLM had analyzed a full range of alternatives, there was essentially no consideration of the impact to public interests that would occur as a consequence of imposition of the environmental protection measures such as Visual Resource Management(VRM) management objectives, Special Recreation Management Areas (SRMAs), leasing withdrawals, leasing with No Surface Occupancy (NSO), and designation of Areas of Critical Environmental Concern (ACEC).	Please see general comment responses #2 and #132
Bill Barrett Corporation	Socioeconomics	The analysis that was conducted is also fatally flawed with respect to the socioeconomic impact analysis. That is, even if BLM had analyzed a full range of alternatives, there was essentially no consideration of the impact to public interests that would occur as a consequence of imposition of the environmental protection measures such as Visual Resource Management (VRM) management objectives, Special Recreation Management Areas (SRMAs), leasing withdrawals, leasing with No Surface Occupancy (NSO), and designation of Areas of Critical Environmental Concern (ACEC). What BLM describes as a "balance" has no basis without consideration of	The RFD has been adjusted to reflect more accurately the future anticipated development. The Chapter 4 economic analysis was also adjusted to reflect this information. Appendix 23 of the Draft RMP/EIS contained information concerning EPCA considerations in the planning process. See

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		socioeconomic impacts! This is especially disappointing as it is only at this stage in the BLM's planning process that these impacts can be fully considered and incorporated into land management objectives.	general comment responses #132 and #133.
Bill Barrett Corporation	Socioeconomics	Socioeconomic Impact Analysis: Contrary to the perception conveyed by staff in the Price Resource Area Office, leasing of federal lands is not conducted to enrich exploration companies but because it is in the public interest to do so. Without quantifying benefits as well as the impacts of development, it is impossible to make proper planning decisions. Oil and gas development has significant impact at all economic scales. Development, or lack thereof, in the Price Resource Area will literally have a national impact. BLM must quantify the economic impact of full development as described by the RFD and the reduction in economic gain and other impacts that are associated with environmental restrictions. Positive impacts will be realized at the local level through employment and spending for goods and services necessary for the development. Production taxes, royalties and leasing bonus and rentals are realized at the Federal, state and county level. BLM must also consider the impact that planning decisions have on the commodity price at a national level. Natural gas is an extremely inelastic commodity and a small change in supply yields a large change in the price paid by families and industry. The decisions made by the BLM for this Resource Area will directly affect every family in the country. Research conducted by Energy and Environmental Analysis, an energy research that is respected by both energy suppliers and conservation organizations, indicates that a one percent change in national supply causes a 20 percent change in the wholesale price of the commodity. The additional supply provided by timely development of oil and gas resources in the Price Resource Area would have an impact of hundreds of millions of dollars a year. BLM must also consider the human impact of the numerous timing limitations contemplated by the proposed and current plan. In addition to disrupting supply for six months of the year and the resulting impacts to commodity prices as described above, there is an impact at the individual level. Rather than promoting orderly year-round development and a stable workforce, BLM policy causes an annual turnover in work force, disrupting families, causing unnecessary turmoil in communities, increasing accident rates due to the annual introduction of numerous new employees to new jobs in the relatively hazardous oil and gas workplace. Rather than potentially disturb a few mule deer, BLM prefers to disrupt communities and cause individual suffering. Less costly and less disruptive alternatives for wildlife management must be developed and analyzed in the RMP.	See general comment responses #132 and #133. Chapter 3, section 3.6 of the Proposed RMP/Final EIS assesses public finance and government services from having access to BLM lands for multiple uses. This includes an analysis of how BLM lands and federal mineral estate managed within Emery and Carbon Counties affect local, state, and federal government budgets and expenditures from mineral royalties, taxes, Payment in Lieu of Taxes, fees and other revenues. A discussion of the potential fiscal impacts to state and local governments has been added to Chapter 4, section 4.6. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes the economic contribution (i.e. jobs, income, tax revenues, etc.) of energy production, recreation, and grazing on BLM lands for Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, section 4.6. In 2007, Carbon and Emery Counties provided 0.2% of Utah's total oil production and 28.5 % of Utah's total gas production (DOGM, 2006). Utah ranks 12th nationally in oil production and 10th nationally in gas production (DOGM, 2008). For natural gas, Carbon and Emery Counties accounted for 0.45 % of total US production in 2007. Sources: DOGM, 2008; ttp://tonto.eia.doe.gov/dnav/ng/ng_sum_top.asp This suggests that production in the Price Field Office, although important to the local economy, is not as critical to domestic gas supplies as the comment suggests.
Bill Barrett Corporation	Socioeconomics	Without quantifying benefits as well as the impacts of development, it is impossible to make proper planning decisions. Oil and gas development has significant impact at all economic scales. Development, or lack thereof, in the Price Resource Area will literally have a national impact. BLM must quantify the economic impact of full	See general comment responses #132 and #133. The Proposed RMP/Final EIS evaluates the economic contribution and social impacts of energy

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		development as described by the RFD and the reduction in economic gain and other impacts that are associated with environmental restrictions. Positive impacts will be realized at the local level through employment and spending for goods and services necessary for the development. Production taxes, royalties and leasing bonus and rental are realized at the Federal, state and county level. BLM must also consider the impact the planning decisions have on the commodity price at a national level. Natural gas is an extremely inelastic commodity and a small change in supply yields a large change in the price paid by families and industry. The decisions made by the BLM for this Resource Area will directly affect every family in the country. Research conducted by Energy and Environmental Analysis, an energy research that is respected by both energy suppliers and conservation organizations, indicates that a one percent change in national supply causes a 20 percent change in the wholesale price of the commodity. The additional supply provided by timely development of oil and gas resources in the Price Resource Area would have an impact of hundreds of millions of dollars a year. BLM must also consider the human impact of the numerous timing limitations contemplated by the proposed and current plan. In addition to disrupting supply for six months of the year and the resulting impacts to commodity prices as described above, there is an impact at the individual level. Rather than promoting orderly year-round development and a stable workforce, BLM policy causes an annual turnover in workforce, disrupting families, causing unnecessary turmoil in communities, increasing accident rates due to the annual introduction of numerous new employees to new jobs in the relatively hazardous oil and gas workplace. Rather than potentially disturb a few mule deer, BLM prefers to disrupt communities and cause individual suffering. Less costly and less disruptive alternatives for wildlife management must be developed and analyzed in the RMP.	production, grazing, and recreation on BLM lands to Emery and Carbon counties. A discussion of this analysis is provided in Volume Section 4.6. Further details on taxes, leases, and royalties along with additional clarity on the No Action alternative serving as the baseline, which all other alternatives are evaluated, will be provided. In 2007, Carbon and Emery Counties provided 0.2% of Utah's total oil production and 28.5 % of Utah's total gas production (DOGM, 2006). Utah ranks 12th nationally in oil production and 10th nationally in gas production (DOGM, 2008). For natural gas, Carbon and Emery Counties accounted for 0.45 % of total US production in 2007. Sources: DOGM, 2008; http://tonto.eia.doe.gov/dnav/ng/ng_sum_top.asp This suggests that production in the Price Field Office, although important to the local economy, is not as critical to domestic gas supplies as the comment suggests.
Bjork Lindley Little PC	Minerals and Energy Resources	In reviewing the draft RMP, I notice that there are federal minerals in T12S, R7E (see Map 3-23), but Maps 2-27 through 2-31 which display the fluid mineral leasing decisions by alternative do not show any allocation for those lands. Since those minerals are within the planning area, it seems the RMP should include the leasing determination for them.	The oil and gas leasing decisions pertain to lands with Federal surface and minerals. The RMP does not make an oil and gas leasing decision for the split-estate lands in T12S,R7E because they have Federal minerals but private surface where land owner agreements would be required.
Blue Ribbon Coalition	ACEC	We object to the proposal to designate additional ACECs because BLM has failed to identify a prevailing need to protect significant values associated with these areas No justification is given regarding fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened resources in proposed ACECs. Designation of additional ACECs (below) is arbitrary and capricious. BRC/USA-ALL strongly opposes any ACEC designated for "Natural Process". BLM lacks authority to manage for subjective resources such as "natural process".	Please see general comment response #129
Blue Ribbon Coalition	Alternative Maps	The DEIS does not contain adequately detailed maps, therefore preventing our members and the public from understanding, and therefore commenting upon, the specific trail designations at issue. BLM has failed to adequately research and document right-of-way ownership within the PFO, resulting in assertion of BLM jurisdiction over state, county and/or private property.	Please see general comment responses #11 and #32
Blue Ribbon Coalition	Alternative Maps	BLM's OHV Route Designation Map for the Preferred Alternative includes nearly 100 miles of paved roads! In fact, the vast majority of the 'green lines' BLM has represented to the public as "open for OHV use" (Map 2-56) are currently closed to unlicensed, OHV use.	Please see general comment responses #31and #78.

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		The vast majority of the routes represented on Map 2-56 are not under BLM's jurisdiction. Their use by vehicles is governed by County ordinance pursuant to State Law. While BRC/USA-ALL acknowledges the importance of cooperation between adjacent jurisdiction when formulating OHV Route Designation Plans, we think representing the `green lines' on Map 2-56 as open for OHV use is misleading.	
Blue Ribbon Coalition	Alternative Maps	The DRMP/DEIS refers to the Chimney Rock/Summerville Trail System and the Arapeen Trail but fail to accurately depict these routes on any map or describe their location at all. Similar flaws exist on all OHV Route Designation Maps in the Appendix. This presents a situation where it is simply impossible for the public to compare and contrast the Alternatives.	Please see general comment responses #31and #32
Blue Ribbon Coalition	OHV Route Identification	A significant percentage of BRC/USA-ALL's members and supporters visit and enjoy land managed by the PFO. It our strong desire to assist the agency in formulating management that provides for this use while protecting natural resources. Specifically, we wish to assist the PFO in developing enjoyable and sustainable recreational trail systems that meet the needs of the wide range of recreationists who visit this remarkable area. But we need to get there from here. Given the significant flaws in the DRMP/DEIS, there is a long way to go. It seems to us that the best route to take is to supplement the process with additional disclosure and analysis and opportunity for the recreating public to become meaningfully involved in the planning process.	See general comment responses #19 and #143
Blue Ribbon Coalition	OHV Route Identification	BRC/USA-ALL strongly advises supplementing the existing DRMP/DEIS and believes one or more viable, if not superior, alternatives have been omitted from the process.	See general comment responses #19 and #143
Blue Ribbon Coalition	OHV Route Identification	BRC/USA-ALL understands and generally supports BLM's Standards and Guidelines for Recreation in Utah. We also support management guidance regarding OHV use limited to designated roads and trails, except for managed and designated "open OHV areas". It is our strong desire to see BLM develop a sustainable OHV trail systems that provide a quality experience to the recreating public while minimizing environmental effects. It would have been our preference to have a wide range of alternatives with specific trail designations available for the public and decision makers to compare and contrast. It would have been our preference to have a consistent set of maps available at the public meetings. Sadly, among other fatal flaws, the DEIS/DRMP fails to describe existing routes or use patterns, misinforms the public on which roads and trails would be available for OHV use under the action alternatives, and fails to describe managed open areas. This makes it impossible to comment on route designations in any action alternative.	The Proposed RMP would not designate all existing routes as open for use. The route designation process was started from a baseline of known existing routes. BLM, with assistance of its cooperators (including Carbon and Emery Counties) has evaluated existing routes, considering resource impacts, safety considerations, landscape settings and recreational opportunities. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose would be closed to OHV use. Because the San Rafael Route Designation and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. See general comment responses #19 and #20.

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Blue Ribbon Coalition	OHV Route Identification	BRC/USA-ALL recommends the following approach to OHV route designations: The BLM will restrict motorized wheeled cross-country travel yearlong except in managed "designated open" areas. BLM will publish a map of existing routes available for OHV use and allow 90 days public comment. BLM will allow for adjustment, addition and augmentation of the "existing routes" inventory map. The disposition of the inventoried routes culminates in a map, installation of signs and information kiosks in the area, public notice of travel restrictions, information and education efforts, and enforcement of the travel restrictions. Signing will be prioritized based on enforcement needs. Some signs could indicate an open road; some could indicate a closed road including barriers such as signs, gates, logs, rocks, brush piles, or segments of fence. If there are areas found "most suitable" for OHV use, signs and maps could be used to "feature" or "highlight" these areas in order to encourage use in these appropriate areas. Educational signs and bulletins could likewise be used to discourage use in areas that have particular needs, especially seasonally. Pursuant to a tiered OHV management plan (site specific planning), roads and trails would be analyzed to evaluate and identify opportunities for trail or road construction and/or improvement, or specific areas where intensive OHV use may be appropriate. Site-specific planning and inventory will be prioritized into High Priority areas, Moderate Priority areas, and Low priority areas. High Priority Areas are those areas that currently have a high level of OHV use that has resulted in documented resource damage and/or resource user conflict (social conflict is not a consideration). Site-specific planning will be initiated within 2 years of the Record of Decision (ROD). Moderate Priority Areas are those areas that have moderate OHV use. Site-specific planning will be initiated within 5 years of the ROD. Low Priority Areas as those areas with minimal OHV use, with the exception of hunting seasons, and are somewhat remote. There are no specific requirements for initiation of site-specific planning for these areas. BRC/USA-ALL supports the designation of "managed open areas" where appropriate. We believe local communities should provide BLM with information regarding areas suitable for this designation close to communities and with designated access to other OHV trails. We also believe a larger "managed open area" is suitable, manageable and eminently appropriate in the Mancos Shale hills surrounding Green River. We intend to provide BLM with specific area recommendations and management guidelines regarding a "`managed open area" near Green River as soon as it is possible. BRC/USA-ALL recognizes the need to give a broad range of recreational experiences to the public. The removal of open areas to motorized access denies individuals and groups the opportunity to experience the land off the beaten path. It is our belief that carefully managed open areas can be managed effectively in appropriate areas. They also lessen violations of the designated areas, by providing users this alternative cross country experience. While some areas may be inappropriate to allow for this type of travel, there are certainly other areas are suitable for the "managed open designation". At a future date, BRC / USA-ALL would like to meet with the PFO planning team to identify, plan, and structure these areas.	Please see general comment response #19
Blue Ribbon Coalition	OHV Route Identification	OHV users, therefore, are unfairly criticized for the increase in "resource conflicts", and "proliferation of new, unplanned roads and trails". Although these are important concerns that must be addressed in this planning effort, the situation is not reflective of "out of control" OHV users as much as indicator of the unmet demand for	Please see general comment response #19

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		recreational infrastructure.	
Blue Ribbon Coalition	OHV Route Identification	The Final Plan should include areas where OHV trails can be constructed and maintained when demand increases. The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems.	Please see general comment response #19
Blue Ribbon Coalition	OHV Route Identification	The Final Plan should include the following Goals and Objectives for OHV management: Based on the BLM's OHV Strategy, the PFO's Pre Plan, the AMS and review of the Scoping Report, the following issues associated with OHV use should be presented in the Final Plan: Economics, access for physically challenged, recreational and family values benefits, value as a recreational resource, effective management, dispersal, law enforcement compliance with land use plan, user education, resource impacts, social conflict and safety. The Final Plan should include the following Goals and Objectives for each issue: Economics, Goal: "Manage OHV use in a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall rangeland health, vegetation, wildlife and other visitors. Objectives: When possible, route OHV routes into adjacent communities. This should be accomplished during the route designation process. Identify areas where local communities may post information regarding goods and services are available. This should be done during the OHV route implementation process or as needs arise. · Identify as many routes as possible that may be used for Jamborees and other organized events. This should be done during the route designation process. Streamline the Special Recreation Permit application process. This should be accomplished immediately after the RMP is final. The District Manager should make all site specific project level planning decisions as consistent as possible to the plans of adjacent communities. Access for physically challenged, Goal: Provide a reasonable range of access opportunity to see the backcountry through OHV use by youth, the aging population and the physically handicapped. Objectives: Primitive ROS should be designated only where existing uses are compatible, leaving as much of the planning area open for access by the disabled via vehicles. This should be accomplished whenever changes in ROS are contemplated. Where appropriate, facilities should be constructed that are disabled access friendly. Recreational and family values benefits, Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of OHV trail riding opportunities that fulfill the experience desired by family outings. Objectives: Identify as many routes as possible that may be used for Jamborees and other organized events. This should be accomplished in the OHV Route Designation Process. Identify areas suitable for large family gatherings. This should be accomplished in the OHV Route Designation Process	Chapter 4 of the Proposed RMP/Final EIS analyzes impacts of OHV management on social and economic conditions and on other resources and uses. Safety, enforcement, signing etc. will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. Also general comment responses #15, #19, and #20

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		Identify areas suitable for large family gatherings along OHV routes. This should be accomplished in the OHV Route Designation Process. Identify areas where large groups can stop for lunch, view scenic overlooks etc. This should be accomplished in the OHV Route Designation Process. Recreation, Goal: OHV use is recognized as an acceptable use of the Public Lands. The goal should be to use proven recreation management principles to manage vehicle-based recreation that is sustainable, manageable and enjoyable. Objectives: Routes should be designated that provide a variety of difficulty; routes should be designated that provide a variety of experiences; routes should be designated that provide opportunity for a variety of vehicle types; routes should be designated that provide access to destinations. The integrity of the "loop" trail system should be maintained. Loop trails offer trail users a more desirable recreational experience. Spurs are suitable for destination features such as scenic overlooks, campsites, viewing historic and cultural resources etc. These objectives should be accomplished during the OHV route designation process. Effective Management: Goal: Actively manage 01-1V use by providing an extensive designated route trail system that satisfies the experience desired by OHV recreationists, which keys upon the monitoring factors of customer satisfaction, education, compliance and enforcement. Objectives: Utah NRCC standardized route signing and marking will be used. Maintain, reconstruct, and relocate designated OHV routes to reduce resource impacts. Emphasis should first be given to maintenance, reconstruction, and relocation of roads before closures are considered. Proper education programs and service programs must be an important focus of any Travel Plan. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, in order to reduce social conflict, the plan should provide for the education of pedestrian and equestrian users about the availability of areas that meet their recreation opportunity setting both in the PFO as well as on adjacent public lands or National Forests. Where possible, agencies are encouraged to provide trailheads for popular trails. The integrity of the "loop" trail system should be maintained. Spurs are suitable for destination features such as scenic overlooks, campsites, viewing historic and cultural resources etc. • Trails, when closed, should be signed with an official, legitimate reason. Monitoring should be implemented to justify the reasons stated. The BLM will use all upgrading management techniques, such as, bridging, puncheon, realignment, drains, and dips to prevent closure or loss of motorized trail use. Integrate the Utah State Trail Patrol Program and/or Good Will Rider Program into the Travel Plan. Establish OHV census collection points at road and trail collection points. Include an OHV category on all trail and road census sheets. BLM should use valid recreational management principles, i.e., providing a variety of experiences, challenges, including loop trails, trails to breathtaking views, connecting existing routes etc. Engage in cooperative management with OHV groups and individuals. In order to properly address the increase in popularity of OHV use now and in the future, travel management alternatives should be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation measures.	

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		Proper education programs and service programs must be an important focus of the Travel Plan. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, in order to reduce social conflict, the plan should provide for the education of pedestrian and equestrian users about the availability of areas that meet their recreation opportunity setting both in the Forest as well as on adjacent public lands or National Parks. Dispersal, Goal: Closures are eminent in some areas and existing motorized will be displaced to other areas. In order to minimize impacts to the remaining roads, trails and areas open for OHV use the plan will allow for additional access and additional recreational opportunities in suitable areas. Objectives: Keep as many routes open for motorized use as appropriate, disperse all forms of recreational use in order to minimize impacts in any particular area. Disperse all forms of recreational use so as to minimize conflict and create a more desirable experience. Law enforcement/compliance with land use plans, Goal: Enhance OHV user accountability and responsibility to ensure common sense compliance among the majority of riders so that law enforcement can handle the small percentage of willful abusers. Goal: Educate recreationists on the potential resource impacts and user responsibilities of OHV use through partnerships with user groups, other agencies and the formal education system. Objectives: Education will be the first line of action. Proper education programs and service programs will be an important focus of the Final Plan as well as the OHV Route Designation Plan. This emphasis will be a key part to avoiding and minimizing resource and social user conflicts. Educational programs could include use of mailings, handouts, improved travel management mapping, pamphlets, TV and radio spots, web pages, newspaper articles, signing, presentations, information kiosks with mapping, and trail rangers. Incorporate the State of Utah, Division of Natural Resources, Department of Recreation, OHV Program Utah Trail Patrol into all management activities. Incorporate local law enforcement into BLM law enforcement efforts. Incorporate cooperative management effort (volunteer coordination) into the Final Plan and the OHV Route Designation Plan as the best method to instill a commitment from the agency to engage in volunteer management projects which are the best method to increase compliance with rules and regulations.• OHV rules and regulations should be available at kiosks. Accurate maps and information should be easily available to the public on PFO's website, where entering the PFO, local businesses and at Kiosks. Utilize, and incorporate into the Route Designation Plan educational efforts such as the "Featured Ride" mapping program recently initiated by the Utah Parks and Recreation OHV program. Resource Impacts, Goal: Develop, maintain and reroute trail systems for OHV use that meet reasonable criteria for acceptable resource mitigation that is based on credible site specific science. Objectives: Routes should be located to minimize damage to soil, watershed, vegetation, air, or other resources. This should be accomplished during the OHV Route Designation Process. Routes should be located to minimize harassment of wildlife or significant disruption of wildlife habitats. This should be accomplished during the OHV	

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		Route Designation Process. Social Conflict, Goal: Provide for a wide range of accessible and highly desirable recreation experiences and opportunities for visitors and community residents while protecting other resource values. Objectives: Educate the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters. Educate vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encourage slower speeds and a more courteous ethic in these areas. Re- routing : Either use so as to avoid sections of roads or trails that are extremely poplar with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV routes; or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc. • Disperse all forms of recreational use so as to minimize conflict and create a more desirable experience. Safety, Goal: Provide for a safe environment for OHV use, weighing expectations for risk and challenge, through identification of appropriate designated routes. Objectives: Educating the vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encouraging slower speeds and a more courteous ethic in these areas. Work with state and county on effective signing on county roads that allow unlicensed vehicles. Utilize standardized trail signing and marking in coordination with the Utah NRCC, including the standardized trail difficulty rating system for all OHV trails.	
Blue Ribbon Coalition	OHV Route Identification	Inconsistencies abound within the DRMP/DEIS pertaining to OHV use making the document unintelligible. Another indication of the document's critical flaw is the inconsistency when describing management actions. One example: In section 1.6.10.1 Off-Highway Vehicle Use BLM states, “OHV use has become a significant issue within the PFO. OHV use and management will be addressed in conformance with the BLM National OHV Strategy in an effort to resolve resource conflicts that pertain to other natural resources and provide for responsible OHV use”. Existing OHV use categories and route designations will be reviewed and modified where needed to meet changing resource objectives. Within the limited category, BLM will designate specific roads and trails for OHV use. The 2003 San Rafael Motorized Route Designation Plan is incorporated by reference into this RMP. The document states that OHV route designations will be reviewed and modified where needed to meet changing resource objectives but also states that the San Rafael Motorized Route Designation Plan (the first time we've heard it called that) is incorporated by reference into the RMP. I can't tell you how many OHV enthusiasts who called BRC/USA-ALL offices to ask which is it: are route designations going to be reviewed and modified or is the San Rafael Route Designation Plan going to be incorporated into the RMP? It's a darned good question. The DRMP and DEIS contains conflicting information regarding the OHV area designations, in some places	The descriptions of management alternatives in the Draft RMP/EIS are not inconsistent but the Proposed RMP/Final EIS has been written and edited to provide more clarity than the Draft RMP/EIS. The San Rafael Route Designation Plan is common to all of the alternatives, and cross country OHV travel would be considered in areas under future R&PP leases adjacent to or near incorporated towns in previously disturbed areas. Maps 2-69, and 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV Route Designations for each of the alternatives analyzed in detail. However, as stated in Table 2-15, under Recreation Management Guidance Common to All Alternatives, non-motorized and motorized recreational trails will be addressed in activity level plans. Therefore, enforcement, signing, safety, etc. and modifications to designated routes will be considered in the future in activity level travel management plans. Also see general comment responses #19, #20 and #82.

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		stating that "all OHV recreational activity will be subject to designated trails" (all alternatives DRMP/DEIS 2-86), but in other areas stating that "Small open areas for OHV use would be considered near local communities and managed by BLM" (Alternative A DRMP/DEIS 2-86).	
Blue Ribbon Coalition	OHV Route Identification	Another inconsistency is a reference in Chapter 2 to the popular Chimney Rock/Summerville trail systems and Arapeen Trail connector routes and implies they will be designated as open to vehicle use (see DRMP/DEIS 2-82, 2-83). Can the public reasonably assume these popular OHV routes will remain open? Who can say? The document is conflicting by not including any of these routes on any of the OHV route designation maps.	Please see general comment responses #20 and #31.
Blue Ribbon Coalition	OHV Route Identification	Maps displayed for public review at several public meetings bore no resemblance to maps contained in DRMP/DEIS. Additionally different OHV Route Designation Maps were displayed at different meetings.	Please see general comment response #20
Blue Ribbon Coalition	OHV Route Identification	As we have described earlier in these comments, the BLM's route inventory is inadequate.	Please see general comment response #19
Blue Ribbon Coalition	OHV Route Identification	Beginning in early June 2003, even prior to the official start of the RMP planning process, BLM sought information regarding various resource uses and values including OHV routes. BLM was to have used information received when preparing a Draft Resource Management Plan. BLM received input that indicated the route inventory was a critical inventory need and OHV individuals and groups raised the issue with PFO staff. Staff indicated there was no budget for comprehensive route inventories so local citizens began to document existing travelways. Citizens worked with PFO's GIS specialist to develop data useful for BLM in making OHV use allocation decisions. Instead of incorporating the information received from the public as required by law, BLM deliberately ignored virtually all of the data. BLM employees made assurances to interested parties that their input would be considered, yet, those assurances were never followed through. As a result, the OHV Route Designation maps in the Appendix are fatally flawed and none of them represent a meaningful management alternative. This situation makes it impossible to compare, contrast and comment on the action alternatives. Additionally, Routes will be closed in all action alternatives that were not seriously considered in the, planning process because input from interested publics was discarded or deliberately ignored. This deliberate denial of input is indicative of a bias against OHV use in general and motorcycle trails specifically. Conversely, public input regarding areas with "wilderness character" was not only considered, but brought into the planning process without question.	See general comment responses #19, #20 and #31.
Blue Ribbon Coalition	OHV Route Identification	Rationale for Supplemental Draft EIS: Our primary concern at this point is that the DRMP/DEIS is very probably fatally flawed and if a Supplemental DRMP/DEIS is not issued needed management will be blocked by endless appeal, protest and litigation. The Blue Ribbon Coalition understands and generally supports BLM's management guidance regarding OHV use limited to designated road, trails and "managed open areas". It is our strong desire to see BLM develop a sustainable OHV trail systems that provide a quality experience to the recreating public while minimizing environmental effects.	Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Alternatives are considered for the Price MFP portion of the planning area. See general comment response #143 that deals with questions on the

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		It is very difficult to envision how BLM will be able to legally move from a document that does not contain one accurate OHV designation map for any action alternative to a Final Plan without giving the public the opportunity to view existing conditions, understand the rationale and criteria used to develop alternatives and be given enough accurate information to compare and contrast a range bf route designation alternatives. Errors of this nature reflect the inadequate scoping process and prevent meaningful public understanding of, and comment upon, the agency's proposal. The document reflects BLM's inadequate and fatally flawed scoping shortcuts, incorrectly asserting that the presented alternatives were "developed through the public participation process..." and glossing over the details of the EIS scoping process. As a result of this deficient process the DRMP/DEIS is fatally flawed. BRC/USA-ALL formally requests BLM supplement the process with a Supplemental DRMP/DEIS.	need to supplement the Draft RMP/EIS. Modifications to route designations will be considered on a case-by-case basis as activity level travel management plans are prepared.
Blue Ribbon Coalition	Process and Procedures	B: SPECIFIC COMMENTS REGARDING FLAWS IN THE DRMP/DEIS: The DRMP/DEIS insufficiently and inaccurately describes the purpose and need to amend RMP. Obviously, the BLM must go beyond the statutory requirement to amend the plan when describing the purpose and need. BLM is required to define specific areas where management needs to be changed. Chapter 1 should clearly describe why a different type of management is needed. Example: In section 1.2.2, under "Need", BLM states: Changes in recreation users and types of recreational opportunities have resulted in conflicts and resource concerns that the old plans were not designed to address. A reader may reasonably ask, what are the changes in recreation users and types of recreational opportunities and how have these changes resulted in conflicts? What is it about the old plans that limited their ability to address these changes? The next sentence does not suffice as an answer: These uses need to be addressed in terms of how they affect local communities, regional and state interests, and ecosystem health. Changes in user types and recreational opportunities do not translate to "uses" without adequate explanation. This sentence only raises additional questions; how do these uses (or changes) affect local communities, regional and state interests? What are the impacts to ecosystem health that require change in management?	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various resources and uses would change to meet the needs for the plan revision.
Blue Ribbon Coalition	Process and Procedures	What are the new technologies and what are the changes in type and level of impacts to various resources? The agency needs to be more specific. The changes in technology we are aware of have reduced impacts of oil and gas development (horizontal drilling, for example). So why do the changes between the old land use plan and all of the action alternatives in the DRMPIDEIS include substantial restrictions on oil and gas development? Frankly, we're confused. What is it that necessitates the need for the change? This problem is especially pronounced when addressing recreational uses. At a time when recreation on public lands is increasing and becoming increasingly important to the American public, BLM has proposed significant reductions in use levels in virtually every action alternative. But the document fails to tell us why. The document contains no nexus between the current condition and the management in each action Alternative. Chapter 1 is the proper place to inform the general public about changes taken place and why the old land use plans are inadequate. Chapter 1 fails to adequately or accurately support the need for change as well as support the range of alternatives.	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various resources and uses would change to meet the needs for the plan revision.

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		Chapter 1 must be supplemented with information that accurately describes the need for change in such a way that the general public and decision makers can reasonably discern how each Alternative addresses each need and how each Alternative responds to the issues.	
Blue Ribbon Coalition	Process and Procedures	The critical flaw in the DRMP/DEIS is that it is written so that the public and decision makers simply cannot determine what LUA's BLM has identified. This is a basic and critical mandate placed upon the agency and cannot be ignored. BLM has failed to clearly and concisely describe management Objectives and desired future condition. The document fails to describe how allocation "tools" meet the management Objectives. The public is presented with a hodge-podge of overlapping and confusing management layers each with its own impacts to recreation. The reader cannot determine what management proscriptions apply to their choice of recreational activity at any given place, let alone the rationale BLM is using for the various management restrictions. Example: Chapter 2 describes management restrictions pursuant to the goals and objectives in the San Rafael Swell SRMA and then indicates an activity plan will be completed. Overlapping the SRMA is a "High Use Area" with yet another activity level plan associated with it. Within the SRMA and adjacent to the High Use Area is an ACEC, complete with its own management restrictions. Overlapping all of this are group size and vehicle restrictions contained in ROS classes.	Please see general comment response #37
Blue Ribbon Coalition	Process and Procedures	Land use plan decisions for public lands fall into two categories: desired outcomes (goals, standards, and objectives), and allowable uses and actions to achieve desired outcomes. Goals are generally broad statements of desired outcomes (e.g., maintain ecosystem health and productivity, promote community stability, ensure sustainable development). They are usually not quantifiable. Objectives identify specific desired conditions for resources. Objectives have established time frames, as appropriate, for achievement and are usually quantifiable and measurable (e.g., manage vegetative communities on the upland portion of the Clear Creek watershed to achieve by 2020, an average 30 to 40 percent canopy cover of sagebrush to sustain sagebrush-obligate species). The Goals and Objectives in the DRMP/DEIS for the various categories of resources, resource uses, special designations, and support are described in Sections 2.2 through 2.5, respectively (2.1.2 Goals and Objectives DRMPIDEIS pp 2-2 through 2-6). None of these "Goals and Objectives" can be remotely described as specific. None contain time frames for achievement or do they included quantifiable measurements. This is no small matter. It cannot be lawfully remedied by changed section 2.1.2 from "Goals and Objectives" to read simply "Goals". Yet, it seems the DRMP/DEIS treats "management objectives" as Goals.	The goals and objectives have been revised for the Proposed RMP/Final EIS to better explain the objectives and desired outcomes for each of the alternatives analyzed in detail. The level of detail suggested in the comment is not appropriate for the planning level of decisionmaking, but can be incorporated as the plan level decisions are implemented.
Blue Ribbon Coalition	Process and Procedures	Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain very similar, highly restrictive management prescriptions. Through the use of overlapping and confusing management "layers" BLM will attempt to require the public to comply with similarly confusing layers of restrictions, permits and fees. Aside from a slight difference in group size limits and slight change in SRMA boundaries there are very few differences in the action alternatives. As an example of the similarities, we note that there is no alternative with	Please see general comment responses #2 and #37

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		group size limits that aren't tied to the ROS class.	
Blue Ribbon Coalition	Process and Procedures	The DRMP/DEIS provides inadequate information on its proposed management. In many cases, such as the highly restrictive group size limits proposed in all of the action Alternatives, the proposed management is not supported by any reasonable rationale. There legal requirement as well as a critical need to clearly articulate the desired future condition, frame the issues, describe resources and impacts to be addressed and disclose the criteria for the development of the Alternatives. The DRMP/DEIS does none of this. The public should be able to clearly understand why specific management has been proposed in accordance with each alternative based upon desired future conditions and changes in existing resource conditions. The document fails to provide the requisite analysis necessary to justify resource management proposals and in particular, restrictive management proposals that differ from current management.	Please see general comment response #123
Blue Ribbon Coalition	Process and Procedures	Public input was not appropriately considered. In our opinion, the document is fundamentally flawed in several key components, primarily as a result of BLM's deliberate efforts to withhold and delay meaningful public involvement mandated by law. BLM ignored data and delayed analysis in a manner that resulted in a pre-determined outcome. Public input regarding the accuracy of BLM's baseline route inventory data was never considered in a meaningful manner. The deliberate withholding and delay of public input resulted in the arbitrary closure of many valuable routes and in fact, entire trail systems.	Please see general comment response #142
Blue Ribbon Coalition	Process and Procedures	Comment on analysis (Chapter 4): The analysis in Chapter 4 should provide the nexus between on the ground condition, current management and alternative chosen. The analysis should be supported by evidence. The DRMP/DEIS fails to provide analysis that will provide context and describe impacts in sufficient detail for public and decision makers to reach conclusions about the alternatives. The analysis of the impacts in the document fails to be compared and contrasted to analysis of the environmental effects of natural events including floods, wildfires, drought etc. Environmental analysis must not be pre-occupied with documenting what can be presently observed on the ground (at various points in time) while ignoring the legally relevant issue of whether on-the-ground conditions constitute significant impacts to the human environment.	Please see general comment response #123
Blue Ribbon Coalition	Process and Procedures	The DRMP/DEIS doesn't provide the public or decision makers sufficient information, rationale and analysis to comment on proposed management, asses a variety of methods to address issues or compare and contrast a wide range of alternatives. BRC/USA-ALL strongly urge BLM to revise and supplement the DRMP/DEIS and incorporate our suggestions in these comments. We strongly urge BLM to seek additional input from the recreating public regarding formation of different and better management alternatives. We also hope BLM will clearly articulate the need for the proposed management.	Please see general comment response #143
Blue Ribbon Coalition	Recreation	BLM may use a variety of "tools" to make recreational use allocations. Many, if not all are use in the DRMP/DEIS. For example, Recreation Opportunity Spectrum (ROS), Special Recreation Management Area (SRMA), OHV designations, etc. The DRMP/DEIS does not make effectively use of these `tools', however. The DRMP/DEIS does not adequately define or describe the desired future condition. The ROS inventory is flawed, out of date and conflicts with existing recreation management. The SRMA management goals and objectives aren't well defined and activity plans have not been prepared. Additional `designations' such as "High Use Areas" and ACECs overlap and provide different and sometimes inconsistent management. In the Preferred Alternative, each of these additional	Please see general comment response #50

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		`designations' also appear to require separate activity plans. BRC/USA-ALL believes that if the agency wishes to push ahead to a Final Plan without additional analysis the Final Plan must clearly define the Goals and Objectives that address issues raised in the scoping process. These recommendations attempt to do that.	
Blue Ribbon Coalition	Recreation	RE: Group Size Limits and Special Recreation Permits: Utah's families are notably larger than most. It's not unusual to find family gatherings including 50 persons or larger. It is most important that land use plans do not unnecessarily or arbitrarily limit recreational use by family groups. This is most important in the PFO, where "Easterin" is a firmly established socio-economic phenomenon.	Please see general comment response #81
Blue Ribbon Coalition	Recreation	BRC/USA-ALL objects to the manner in which large groups are limited to "Large Group Areas". We implore the planning team to visit these areas and ask if they have the same features as areas that are currently used by large groups (i.e. Head of Sinbad campsites). The large group area recently designated pursuant to the Temple Mountain - Southern Reef Recreation Site Development project (EA UT-070-2003-02) is way too small for the level of use it currently receives. This will present numerous management problems and will result in displacement of existing use into other areas not yet impacted. Limiting large groups to these few areas will unfairly and negatively impact organized OHV groups. The same is true for the group size restrictions outlined in the San Rafael SRMA in the action Alternatives.	Please see general comment response #81
Blue Ribbon Coalition	Recreation	BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Recommendations: Group size limits should not be specific to ROS determinations as is specified in all action alternatives. The PFO is encouraged to develop a simpler, easier to comply with group size limit policy that will be consistent across SRMAs and other management areas. A single group size limit for the entire PFO is recommended. Special Use Permit regulations and implementation of those regulations must be clarified in the Final Plan so that an average Utah family does not have to secure a permit, obtain insurance or pay a fee for simple family outings. The Special Recreation Permit process must be implemented in such a way that a quick visit to BLM's website will enable people to determine if a permit is necessary, what the fees will be and what the stipulations will be required. The process outlined in the DRMPIDEIS (appendix 14) is extremely confusing and puts the onus on the recreating public to determine if their activity will have a low, moderate or high impact on resources such as soils, vegetation and "environmental effects"(?).	Please see general comment response #81
Blue Ribbon Coalition	Recreation	The definition of Dispersed Camping should be clearly and concisely described in the plan. From review of the Pre Plan, the AMS and the Scoping Report, the following issues surrounding Dispersed Camping should be addressed in the Final Plan: Human waste, trash, proliferation of both campsites and fire rings, OHV/Equestrian Staging areas and "Social Trails", impacts to archeological sites, impacts to vegetation, camping activities occurring in "inappropriate areas", impacts to wildlife and wildlife habitat	Please see general comment response #93
Blue Ribbon Coalition	Recreation	Use Pattern Information: Managing camping requires a fairly complete understanding of who, what, when and where. Often, land managers lack this information. The Final Plan should identify inventory and use pattern	The BLM agrees that additional inventories and assessment is needed; however, this issue is

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		information needs and set objectives for meeting those needs. Campsite analysis: This is also important for Dispersed Camping management. This is best described as being a judgment of "risk v. value" or "opportunity v. trade-off" for each campsite.	beyond the scope of the RMP.
Blue Ribbon Coalition	Recreation	Mitigation: Many problems associated with Dispersed Camping can be resolved with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access "routes") • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing "impacted areas" and limiting use to those areas. (Identifying currently used sites and `marking' them by permanent fire rings or signage) • Appropriate buffer from streams and lakes. (Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation) • Archeological clearance • Sustainable signing. (If possible, all signing should be literally bullet proof)	Please see general comment response #93
Blue Ribbon Coalition	Recreation	The Final Plan should include the following Goals and Objectives for Dispersed Camping: Goal: Manage Dispersed Camping use on public lands and National Forests in such a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall forest and rangeland health, vegetation and wildlife. Objectives: • Identify and map roads and trails that tie to adjacent communities where food, lodging, fuel and other goods and services may be found. This should be accomplished during OHV route designation process. • Identify areas where local communities may post information regarding where goods and services are available in adjacent communities. This should be accomplished during the OHV route implementation process. • The Special Recreation Permit application process should be made as streamlined as possible so that large groups may be able to camp in appropriate areas. Annual review is suggested for modification of permitting process. • BLM will pursue partnerships and grants for developing logical Dispersed Camping management to help mitigate budget constraints. • Where compatible with reasonable conservation measures, access to campsites will be maintained in areas offering the opportunity to see wildlife and view scenic vistas. This should be accomplished during the OHV Route Designation Process. • Dispersed Campsites and Dispersed Camping areas shall be located to minimize significant damage to soil, watershed, vegetation, wildlife or other resources • Dispersed Campsites and Dispersed Camping areas shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of Dispersed Camping opportunities that fulfill the experience desired by family outings.	Please see general comment response #93

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		Objectives: • Travel maps will identify Dispersed Campsites and Dispersed Camping areas that can used by families and/or large groups. This should be accomplished in the OHV route implementation process • Spur routes will be designated for motorized access to Dispersed Campsites and other destinations such as scenic overlooks, viewing historic and cultural resources etc. This should be accomplished during the OHV Route Designation process. Goal: Actively manage Dispersed Camping in order to ensure an extensive opportunity that satisfies the experience desired by a wide range of recreationists while minimizing impacts. Objectives: • Develop best practice models for campsite maintenance, management and development. • An complete and accurate inventory of existing campsites will be completed to support sustained management • Standardized signing on the ground will be implemented throughout land management designations i.e. SRMA, ERMA, ACEC etc. • Maps will be easily available and contain standardized information proper camping etiquette and certain site specific restrictions • Partnerships will be developed with user groups to enhance education, safety, ethics, user sharing, conservation and compliance • Campsites, when closed, will be signed with an official, legitimate reason. Monitoring should be implemented to justify the reasons stated. • Emphasis should first be given to maintenance, reconstruction, and relocation of existing campsites before closures are considered. • Proper education programs and service programs must be an important focus of all recreation management. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. Goal: Minimize impacts and conflicts from Dispersed Camping associated with OHV use by mitigation efforts as well as maximizing the dispersal of OHV staging areas and providing intensive OHV staging areas where it makes sense on the ground. Objectives: • BLM will identify and designate OHV staging areas and trails or "tot lots" for youth activities. This will be accomplished during the route designation process • BLM will clearly delineate access to campsites to reduce proliferation of "social trails". This will be accomplished during implementation of the route designation process Goal: Enhance public land visitor accountability and responsibility so impacts to resources are minimized, campsites remain clean and fire rings do not proliferate. Objectives: • BLM will provide educational and informational materials for distribution to visitors. Information should be available at Kiosks and where major roads provide access to public lands • BLM will attempt to educate recreationists on the potential resource impacts and user responsibilities when engaged in Dispersed Camping use through partnerships with user groups, other agencies and the formal education system.	

Organization	Category	Comment	Response
		Goal: Attain resource sustainability goals by using mitigation instead of closure. Objectives: • Develop best practice models for campsite maintenance, management and development. • Resolve problems associated with Dispersed Camping with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access "routes") • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing "impacted areas" and limiting use to those areas. (Identifying currently used sites and `marking' them by permanent fire rings or signage) • Applying appropriate buffer from streams and lakes. Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation. • Archeological clearance • Sustainable signing.	
Blue Ribbon Coalition	Recreation	All too often, recreationists must resort to creating valuable recreational experiences by themselves, with no guidance, input or assistance from land managers. Routes originally constructed for mineral location and development and livestock grazing have been connected and are now used for recreational purposes. Land managers have created little in the way of recreational opportunity. BLM should consider proliferation of new, unplanned roads and trails as signs of the recreation staff not keeping up with demand. The BLM must think, "recreational infrastructure planning", not "travel management". Think in terms of providing recreational experience, not in terms of punishing the public for searching for such experience.	The alternatives, including the Proposed RMP, would designate routes as closed or open for motorized use. The routes would be mapped and signed, and closure of routes would be enforced on the ground (See Map 2-69 and Maps 2-71 through 2-74 of the Proposed RMP/Final EIS for route designations). The BLM, with assistance of it's cooperators has evaluated routes against a standard set of criteria to consider resource impacts, safety considerations, landscape settings and recreational opportunities. These criteria include cultural resources, watershed, special status species, wildlife, and other uses. The Proposed RMP does not contemplate designating all existing routes. The route designation process started from a baseline of known existing routes, identified the routes that would best serve the motorized recreating public, factoring in conflicts with non-motorized uses when known. A multiple use travel plan that would include designating hiking or horse routes is not part of this phase of planning but will be done later as an activity plan.
Blue Ribbon Coalition	Recreation	Another example is how ROS is treated totally inconsistently in various SRMAs. In all SRMAs except the San Rafael, SPNM classes are closed to vehicle use. In the San Rafael SRMA, the document is silent on any vehicle restrictions related to ROS. What is the public to think?	ROS SPNM was a criteria used in the San Rafael Motorized Route Designation Plan (SRMRDP) of February, 2003. The SRMRDP would be carried forward without modification in all alternatives

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			except Alternative E. The criteria developed in the SRMRDP have been applied to the remainder of the Price Field Office (PFO).
Blue Ribbon Coalition	Recreation	The DRMP/DEIS makes so many site specific decisions regarding recreation management that future management options are precluded.	Please see general comment response #93
Blue Ribbon Coalition	Recreation	The ROS inventory is flawed. Many SPNM classes are in areas that receive substantial OHV recreational use. In several cases, designated OHV routes pass through the SPNM class.	Please see general comment responses #50 and #93
Blue Ribbon Coalition	Recreation	RE: Section 2.8.3 "Recreation" BLM describes actions common to all Alternatives. The second bullet point reads: Where long-term damage by recreational uses is observed or anticipated, limit or control activities through specialized management tools such as designated campsites, permits, area closures, and limitations on number of users and duration of use. Revise recreation management plans and management framework plans when they prove to be either overly restrictive or inadequate to maintain public land health. BRC/USA-ALL strongly objects to this and recommends its revision. The term "long-term damage" is not defined. Implementing management actions on the anticipation that "long-term" damage may occur is inappropriate. BRC/USA-ALL recommends this "bullet" be revised with the following: Recreational activities should be managed to minimize damage to soil, watershed, vegetation, air, or other resources.	Please see general comment response #92
Blue Ribbon Coalition	Recreation	RE: Section 2.8.3 "Recreation" BLM describes actions common to all Alternatives. The fourteenth bullet point reads: Campgrounds and dispersed camping areas in SRMAs could be closed seasonally or as impacts or environmental conditions warrant. Incorporating this into the RMP is redundant and unnecessary. BLM has all the necessary tools to seasonally adjust use "as conditions warrant". Incorporating this section into the RMP will lead to unnecessary and arbitrary closures. Suggestion: BRC/USA-ALL recommends the removal of this "bullet".	The discussion regarding closing campgrounds and dispersed camping areas seasonally or as impacts warrant, is specific to SRMA management and is not meant to be redundant of BLM's general authority.
Blue Ribbon Coalition	Recreation	Trend and condition analysis is meaningless without comparison of baseline condition/degree of change and establishment of the "significance threshold". BRC/USAALL recommends revision of the "Significance Criteria" in the document. Better significant criteria would be indicators that can be quantified by a unit of measure. For example: number of campsites open vs. closed, number of miles of routes open vs. closed. Or miles of routes available for OHV recreation. Or number of loops available. Number of visitor days lost due to management actions etc. The BLM needs to identify the impacts -- then -- quantify and qualify significance. Establish such thresholds on which significance can be judged (or determined). When formulating analysis BLM must ask: does analysis give enough information to make that determination? Is it possible to make comparisons against the baseline data?	Please see general comment response #92
Blue Ribbon Coalition	Socioeconomics	The DRMP/DEIS must include disclosure and analysis of income and employment for various economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns, including motorized recreational activities. The DRMP/DEIS fails to effectively address the full realm of positive economic benefits associated with current and future recreational uses. BLM has failed to incorporate economic impacts into the	See general comment responses #2 and #132

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		decision making process and alternative formation. Despite what BLM may claim, there is no alternative that maximizes economic benefits.	
Blue Ribbon Coalition	Soil, Water and Riparian	RE: Soil, Water, and Riparian Resources: Under Establishment of Buffer Zones for No Surface Disturbance around Riparian-Wetland Habitats within Alternative C, new surface disturbance would be prohibited within the 100-year floodplain or within 100 meters on either side of the centerline along all perennial and intermittent streams. We strongly object to the application of this decision to intermittent streams. An intermittent stream in Utah can sometimes consist of a drainage that carries storm water only once per year. Suggestion: BLM should eliminate the provision for intermittent streams.	Please see general comment response #70
Blue Ribbon Coalition	Transportation and Access	The DRMP/DEIS contains a fatal inconsistency that must be corrected. Although the DRMP/DEIS purports to recognize valid existing rights, it goes out of its way to ignore critical rights of access. The BLM simply cannot have it both ways. On one hand, BLM says one of their key planning criteria is to recognize all valid existing rights, on the other hand BLM says RS 2477 rights-of-ways will not be considered. On one hand, BLM says RS 2477 rights-of-way assertions will be "settled as determined by the Administration.", on the other hand BLM purports to close asserted RS 2477 rights-of-way and threaten fines and imprisonment to any American who chooses to use a vehicle on these roads. The BLM cannot assume that it has authority or discretion to close or to assume jurisdiction over public roads, which by law are controlled by local government. Such an assumption on the Bureau's part is without observance of procedure required by law; and would have to be considered by even the most casual observer as arbitrary, capricious, and an unwarranted attempt to usurp local governments' authority and rights. Utah's RS 2477 rights-of-ways are public assets held in trust by the county and the state. The development of alternatives or any planning activity that would result in the signing of RS 2477 assertions as closed would result in significant harm to many public land visitors especially our members and supporters. Public roads, ways, trails, etc. can only be closed in accordance with State law, which requires a public process, generally carried out by local government BLM cannot take away, and is specifically required and mandated by law to protect valid existing rights in its planning and management of the public lands. There is well-established law that a county or other governmental entity does not need to assert "claims" nor does the BLM need to recognize, a right-of-way, in order for the county to exercise its rights. The BLM must recognize that much of the public access and transportation infrastructure which provides access to public lands in the West is an integral part of the history, the culture, and the socio-economic fabric of the area. These roads are, in fact, a resource and part of the physical infrastructure of counties and local governments and should be recognized as such. Regardless of pending litigation or negotiations over RS 2477 assertions, must find a way of dealing with this issue that is consistent, or at least not inconsistent, with applicable law and which does not force the counties or other public land users into adversarial positions and expensive litigation. BRC/USA-ALL recommends BLM use the RMP process to address asserted rights-of-ways. Where BLM and the	Please see general comment response #11

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		state and counties disagree, specific rights-of-ways should be adjudicated.	
Blue Ribbon Coalition	Wildlife and Fish	RE: Appendix 8 includes a seasonal restriction of April 15 through August 1 in high-value breeding habitats for neotropical migratory birds. Nice try. According to the Utah Division of Wildlife Resources website, the entire PFO is either critical value or high value habitat for neotropical migratory birds. As such, every square inch in the PFO could be designated as high-value breeding habitat.	Please see general comment response #41
Bookcliff Rattlers Motorcycle Club	OHV Route Identification	However, we are confused as we cannot tell which routes are in which of the colored zones on the maps as THERE ARE NO ROUTES SHOWN!	Please see general comment responses #20 and #31
Bookcliff Rattlers Motorcycle Club	OHV Route Identification	The lack of a Route Designation Plan (i.e. Travel Plan) makes it nearly impossible for anyone to comment intelligently as YOU CAN'T TELL WHAT IT WILL MEAN! As it is, the BLM's only fair action is to designate the entire inventory as "OPEN", until a proper inventory can be assembled and presented for public comment, resulting in a route designation process. We are further confused by the fact that the DRMP mentions trail heads, but no trails are designated as open through the process of Route Designation. We are also very much disturbed by the mention of the Free Recovery process. This being the case the BLM MUST hire recreation staff that has an interest in training in OHV management.	Please see general comment responses #19 and #89
Bureau of Reclamation - Provo Office	Alternative Maps	Map 1-1, “General Location Map of Planning Area,” includes Joes Valley Reservoir, but this reservoir is not mentioned anywhere in the document, including tables listing lakes and reservoirs.	Joes Valley reservoir is surrounded by National Forest and private lands. The outer boundaries of the planning area include portions of the Manti LaSal National Forest, but management actions of the RMP do not apply to lands that are not administered by BLM.
Bureau of Reclamation - Provo Office	Alternative Maps	Map 3-18, Federal Coal Leases, does not include the Cottonwood Coal Lease near Joes Valley Dam, which is currently proposed for leasing by BLM. As you may know, Reclamation has concerns about this particular lease related to the potential effects of underground coal mining on the structural safety of Joes Valley Dam.	Please note that there is no Federal Cottonwood Coal Lease. There is a Cottonwood coal tract, administered through the State Institutional Trust Lands Administration (SITLA). A portion of the tract, north of Joes Valley Reservoir has been leased. Therefore, the Proposed RMP/Final EIS does not address the Cottonwood tract.
Bureau of Reclamation - Provo Office	Alternative Maps	Map 3-19, Known Coal Reserves, does not include potential lease tracts near Joes Valley Reservoir and to the south of the reservoir (e.g. North Horn).	Joes Valley reservoir is not included in the management actions of the RMP. Map 3-19 of the Draft RMP/EIS has been modified to show the known coal resources in the areas pointed out in the comment and is included as Map 3-25 in the

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			Proposed RMP/Final EIS.
Bureau of Reclamation - Provo Office	Lands and Realty	Table 1-1 on page 1-4, and related text references, should be modified to include lands owned by the Bureau of Reclamation. Reclamation owns 1,040.98 acres in fee simple, and 1,300.26 acres in permanent easement, for a total of 2,341.24 acres within the project area.	Bureau of Reclamation lands were included in Table 1-1 as part of the Federal acreage calculations. This table was updated using updated GIS shapefiles for land ownership.
Bureau of Reclamation - Provo Office	Minerals and Energy Resources	Management of underground coal mining should include stipulations to protect public safety. For example, the proposed Cottonwood Coal Lease, though not discussed in this document, needs to include buffer zones adequate to protect the integrity of the Joes Valley Dam.	Part of the RMP process is to identify areas that have mineral development potential, analyze the potential impacts of development and categorize areas for future mineral leasing. It should be noted that there is no BLM Cottonwood Coal Lease. There is a proposed SITLA Cottonwood Coal Tract. Therefore, lands commented on are not in the Price RMP area.
Bureau of Reclamation - Provo Office	Wild and Scenic Rivers	Regarding potential designations of Wild and Scenic Rivers, Reclamation is unsupportive of suitability designation of any river or segment where dams or appurtenants exist, are planned (potential), or where in-stream flows are regulated or needed for irrigation, municipal, or industrial purposes.	Please see general comment response #25
Burlington Resources	Minerals and Energy Resources	As active members of Public Lands Advocacy (PLA) and the Independent Petroleum Association of Mountain States (IPAMS), we support the comments they submitted jointly and reiterate the following general points on the draft plan. BR opposes BLM's preferred Alternative D, as it will excessively reduce our industry's ability to explore and develop energy in areas with demonstrated oil and gas resource potential. Nine Mile Canyon and Range Creek are two such areas that are highly prospective for oil and gas. However BLM proposes NSO (no surface occupancy) stipulations and no lease Areas of Critical Environmental Concern (ACEC) in these areas respectively. Moreover, much of Nine Mile Canyon is currently leased, both fee and federal, and there is currently oil and gas development in this area.	Please see general comment response #18
Burlington Resources	Minerals and Energy Resources	The Reasonably Foreseeable Development scenario (RFD) appears to be quite low 1540 wells over the next 15 to 20 years, not adequately addressing the six cited USGS plays and the recent high level of industry activity in the Price Field Office. Additionally, Instruction Memorandum (IM) 2004-89 requires the RFD to project a baseline scenario of activity that assumes all productive areas can be open under standard lease terms and conditions, except for those areas closed by law, regulation or executive order and the IM directs that the number of wells analyzed not be used as a well count threshold during plan implementation. BR recommends that the RFD be revised to address these inadequacies. The DRMP/EIS does not comply with BLM's planning manual. The draft proposal broadly imposes restrictions to limit oil and gas leasing, exploration and development but does not provide a sound foundation for making future decisions. Land use plans must identify uses, or allocations, that are allowable on the public lands and mineral estate and must set the stage for identifying site-specific resource use levels. The draft RMP/EIS does not meet these criteria.	Please see general comment response #53
Burlington Resources	Minerals and Energy Resources	BR opposes BLM's preferred Alternative D, as it will excessively reduce our industry's ability to explore and develop energy in areas with demonstrated oil and gas resource potential. Nine Mile Canyon and Range Creek	Please see general comment response #18

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		are two such areas that are highly prospective for oil and gas. However BLM proposes NSO (no surface occupancy) stipulations and no lease Areas of Critical Environmental Concern (ACEC) in these areas respectively. Moreover, much of Nine Mile Canyon is currently leased, both fee and federal, and there is currently oil and gas development in this area.	
Burlington Resources	Minerals and Energy Resources	The Reasonably Foreseeable Development scenario (RFD) appears to be quite low, 1540 wells over the next 15 to 20 years, not adequately addressing the six cited USGS plays and the recent high level of industry activity in the Price Field Office. Additionally, Instruction Memorandum (IM) 2004-89 requires the RFD to project a baseline scenario of activity that assumes all productive areas can be open under standard lease terms and conditions, except for those areas closed by law, regulation or executive order and the IM directs that the number of wells analyzed not be used as a well count threshold during plan implementation. BR recommends that the RFD be revised to address these inadequacies.	Please see general comment response #53
Burlington Resources	Minerals and Energy Resources	The DRMP/EIS does not comply with BLM's 1601 planning manual. The draft proposal broadly imposes restrictions to limit oil and gas leasing, exploration and development but does not provide a sound foundation for making future decisions. Land use plans must identify uses, or allocations, that are allowable on the public lands and mineral estate and must set the stage for identifying site-specific resource use levels. The draft RMP/EIS does not meet these criteria.	Please see general comment response #18
Burlington Resources	Minerals and Energy Resources	The proposed DRMP/EIS does not comply with the President's Executive Order 13211. For example, the proposed Range Creek ACEC covers nearly 81,000 acres of high potential coal bed natural gas potential identified by the U. S. Geological Survey, as well as high potential for conventional oil and gas development.	Please see general comment response #18
Burlington Resources	Wildlife and Fish	BLM must modify its management of wildlife with respect to oil and gas operations. Appendix 16 does not allow for exceptions or modifications to most seasonal restrictions even when it is demonstrated that the species are not in the area. Flexibility should be provided in these types of scenarios.	Please see general comment response #41
California for Western Wilderness	Wild and Scenic Rivers	It is amazing that the preferred alternative does not seek to classify any river segments as "wild." The Green River segments through Desolation and Labyrinth Canyons deserve to be classified as "wild," as in Alt. C. Desolation Canyon is at the heart of one of the largest roadless areas in the lower 48 states; the Preferred Alternative's designation as merely "scenic" or "recreation" should be changed.	Please see general comment response #148
Californians for Western Wilderness	Minerals and Energy Resources	As for the San Rafael Reef, why should anyone have to look at it through an oil or gas field? Or if one wanted to explore the treasures in its slot canyons, one would have to make one's way through development. Therefore, the lands between Highway 24 and the Reef should be given Visual Resource Management Class 1 status rather than Class 3. In fact, the San Rafael Swell should be treated as a whole unit, with no fluid mineral leasing in its interior, either. Otherwise, you are left with just a shell that is protected, but an interior that is gutted.	Please see general comment responses #18 and #101
Californians For Western Wilderness	Minerals and Energy Resources	Thus it is a matter of grave concern to us that many areas that qualify as wilderness are left open to oil and gas leasing. It is sad that under your preferred Alternative D only 584,000 acres would be closed to leasing. Most of this acreage is in already-excising wilderness study areas. Yet in the wilderness re-inventory that your office did-subsequently nullified by the court settlement between Interior Secretary Norton and then Gov. Mike Leavitt--you found that nearly 90% of the lands included in the Utah Wilderness Coalition Citizens Proposal had wilderness character. It defies belief that you would open all of that to oil and gas leasing.	Please see general comment responses #18 and #101
Californians for Western Wilderness	OHV Route Identification	Areas included America's Redrock Wilderness Act should also be closed to off-highway vehicle use. Routes which have been formed through illegal use should be closed and the landscape restored. OHV use should also be prohibited in all existing wilderness study areas. Citizen-proposed wilderness areas should be designated as primitive in the Recreation Opportunity Spectrum. Additionally, these proposed wilderness areas should be	See general comment responses #12 and #50. ROS has been removed from the planning criteria. See Section 1.6 in the Proposed RMP/Final EIS. However, ROS SPNM was a criteria used in the

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		classified as Areas of Critical Environmental Concern.	San Rafael Motorized Route Designation Plan (SRMRDP) of February, 2003. The SRMRDP would be carried forward without modification in all alternatives except Alternative E. Other criteria developed in the SRMRDP have been applied to the remainder of the Price Field Office (PFO).
Californians For Western Wilderness	OHV Route Identification	Areas included America's Redrock Wilderness Act should also be closed to off-highway vehicle use. Routes which have been formed through illegal use should be closed and the landscape restored. OHV use should also be prohibited in all existing wilderness study areas. Citizen-proposed wilderness areas should be designated as primitive. In the Recreation Opportunity Spectrum. Additionally, these proposed wilderness areas should be classified as Areas of Critical Environmental Concern.	See general comment responses #12, #19 and #36
Californians for Western Wilderness	Process and Procedures	On all the Alt. D maps it sticks out as being less stringently managed than the surrounding areas, whether for oil and gas leasing, OHV use, Visual Resource Management, withdrawal from mineral entry. This area should be treated as the surrounding areas, especially since it is completely isolated, and any intrusion into it would have to cross over areas having more protection.	Please see general comment response #1
Californians For Western Wilderness	Recreation	We are concerned that Desolation Canyon and areas around the San Rafael Reef one of the geological wonders of the West are not more fully protected. Of special concern is that the area around Sand Wash, the put-in for lengthy wilderness raft trips on the Green River are not closed to oil and gas leasing. Also of concern is a small area west of the Green River (Sheephorn Bench?) in Desolation Canyon. On all the Alt. D maps it sticks out as being less stringently managed than the surrounding areas, whether for oil and gas leasing, OHV use, Visual Resource Management, withdrawal from mineral entry. This area should be treated as the surrounding areas, especially since it is completely isolated, and any intrusion into it would have to cross over areas having more protection. The lands between Highway 24 and the Reef should be given Visual Resource Management Class 1 status rather than Class 3. In fact, the San Rafael Swell should be treated as a whole unit, with no fluid mineral leasing in its interior, either. Otherwise, you are left with just a shell that is protected, but an interior that is gutted.	Sand Wash is outside PFO jurisdiction and is managed by Vernal FO. The Bighorn Benches are closed to oil and gas leasing in Alternative C, and no OHV routes would be designated open on the Bighorn Benches under any alternative. Additionally, any action that would be proposed to occur in this area would likely not be feasible because as pointed out in the comment, there would be limited or no access across the surrounding areas. The potential conflicts between programs and VRM designations have been analyzed for each of the alternatives in the Proposed RMP/Final EIS. The RMP will include the decisions required for VRM and BLM will ensure that the allowable uses and allocations are compatible and meet VRM objectives of the selected plan. The Draft RMP/EIS evaluated a range of alternatives to assure that a balanced approach that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production throughout the Field Office is considered. The management actions in the Proposed RMP are intended to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Additionally, as exploration and

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			production activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.
Californians for Western Wilderness	Wild and Scenic Rivers	It is amazing that the preferred alternative does not seek to classify any river segments as "wild." The Green River segments through Desolation and Labyrinth Canyons deserve to be classified as "wild," as in Alt. C. Desolation Canyon is at the heart of one of the largest roadless areas in the lower 48 states; the Preferred Alternative's designation as merely "scenic" or "recreation" should be changed.	Please see general comment response #148
Californians For Western Wilderness	Wild and Scenic Rivers	It is amazing that the preferred alternative does not seek to classify any river segments as "wild," as in Alt. C. Desolation Canyon is at the heart of one of the largest roadless areas in the lower 48 states; the Preferred Alternative's designation as merely "scenic" or "recreation" should be changed.	Please see general comment response #148
Californians for Western Wilderness	Wilderness	Thus it is a matter of grave concern to us that many areas that qualify as wilderness are left open to oil and gas leasing. It is sad that under your preferred Alternative D only 584,000 acres would be closed to leasing. Most of this acreage is in already-existing wilderness study areas.	Please see general comment responses #101 and #109
Californians for Western Wilderness	Wilderness	Yet in the wilderness re-inventory that your office did-subsequently nullified by the court settlement between Interior Secretary Norton and then-Gov. Mike Leavitt-you found that nearly 90% of the lands included in the Utah Wilderness Coalition Citizens Proposal had wilderness character. It defies belief that you would open all of that land to oil and gas leasing.	Please see general comment responses #36, #101 and #109
Californians for Western Wilderness	Wilderness	The American people deserve better than that. Much of this area was proposed for a national park in the mid-1900's. Oil and gas leasing and other resource extractive or destructive activities are not appropriate for landscapes of this importance. In fact, the citizens of Utah and the United States have undertaken their own inventories of wild lands in Utah. These have been proposed to Congress. Lands included in America's Redrock Wilderness Act should not be opened to oil and gas leasing.	Please see general comment responses #36 and #101
Carbon County	ACEC	In all ACEC alternatives there is no consideration for not designating an ACEC in at least one alternative. A full range of alternatives should be developed to include a full range of management prescriptions, including no designation to insure proper analysis. There was no attempt to provide prescription that would protect values of concern without an ACEC designation.	See GCR 131.
Carbon County	ACEC	Map 2-46 shows an ACEC of 17,446 acres titled “Horseshoe. Canyon “. It is not listed in this section or in Chapter 4 analysis.	The nominated Horseshoe Canyon ACEC was incorporated into the “Lower Green River ACEC” and should not have been identified on Map 2-46. This error has been corrected in the Proposed RMP/Final EIS.
Carbon County	ACEC	p. 322, Impacts to Range Creek ACEC: ACEC 's are not consistent with county plans.	See GCRs 130 and 29.
Carbon County	ACEC	ACECs, p.485 Significance Criteria: Our position is that what is important is the value, not the act.	The significance criteria have been removed from the Proposed RMP/Final EIS impact analysis. The impacts are discussed in terms of duration, magnitude and context.

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Carbon County	ACEC	ACEC; Decision Background, p.4- 486: add to the definition "…areas within the public lands…"	The definition of ACEC in the Glossary reflects this change.
Carbon County	ACEC	The ACEC tool was intended by Congress to be limited to only those instances where irreparable damage would be caused without designation. Most surface disturbing actions can eventually be repaired.	See GCR 153.
Carbon County	ACEC	Not considering the private lands and state school sections being located within the boundaries of the proposed ACECs is very disconcerting for us. The cumulative impacts again, were not analyzed.	Access to private and School Trust Lands over public lands is required by regulation and court decisions. Nothing in this RMP can eliminate access guaranteed by Congress, case law and regulation.
Carbon County	ACEC	Existing ACECs; 4-494, Impact analysis: No impact analysis showing impacts to the human environment since designation, advantage to learn from their past actions the cumulative impacts that these actions have created and to objectively report the impacts. Without properly analyzing these cumulative impacts, creation of more ACEC's within the same resource area is in our view, an arbitrary action.	See GCR 152.
Carbon County	ACEC	ACEC management of the CLDQ ACEC; 'p 4-511: Carbon County would like some changes in management including mandatory recreation fee requirement is not consistent with our position. Voluntary cash boxes could be used. Camping would not be allowed This issue needs to be done on a case-by-case basis, in cooperation and in coordination with the affected counties.	CLDQ visitor center is a designated fee area within BLM. It is a noted recreation site, as well as a significant and unique scientific resource. The proposed management has been coordinated with Emery County and is necessary to prevent irreparable damage to these resources.
Carbon County	ACEC	Range Creek ACEC; 4-522: Designating the 65,504-acre ACEC would greatly enhance and protect opportunities for dispersed, non-motorized recreation in the Range Creek area by limiting recreation access to hiking and horseback use. Closure of the area to OHV use and mineral development would maintain existing natural resources and levels of surface disturbance important to primitive recreation experiences. This action is not consistent with County plans.	See GCR 130.
Carbon County	ACEC	Grazing and OHV Use in ACECs; No Action Alternative: This alternative contains 1,339 more acres open for livestock grazing, 1,037 acres are not closed to for OHV recreation use, and 21,354 more acres are open for limited OHV recreation use. The additional amount open for grazing would be consistent. The amount open to OHV use is misleading since motorized use is limited to existing routes, and the 21,354 acres is a misnomer. If the addition of any lands in Carbon County is involved in the calculation of OHV use in this portion, it would not be reasonable, since the routes have yet to be determined by a cooperative approach.	The alternatives, including the Proposed RMP, do not make any changes to the San Rafael Route Designation Plan except for Alternative E where certain routes would be closed to protect areas with wilderness characteristics. Maps 2-71 through 2-74 and Map 2-69 of the Proposed RMP/Final EIS display the route designations for each of the alternatives. Chapter 4 identifies the changes in miles of designated routes by alternative and analyzes the impacts of OHV decisions.
Carbon County	ACEC	Table: Analysis 4-530, 4-551 Table 4-17 is appropriate. Any table that is used to restrict motorized use, grazing or oil and gas development is not consistent with Carbon County plans. The data used to create the table does bring forward the cumulative effects to designation. The layering hampers the ability to manage other resources or values that in the future. The table/layering moots the analysis on the management decisions under any other prescription since whatever is determined on the management levels in the issue by issue comments and analysis completely changes the uses after the layering. Any cumulative analysis, under this scenario is skewed.	See GCRs 37 and 152.
Carbon County	ACEC	Impacts to Areas of Critical Environmental Concern, No significant impact: Any action to do with access will have a definite affect on the ability to use the land.	ACEC designations do not preclude access. Some of the management decisions affect certain modes of travel, but public access into any potential ACEC

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			is not eliminated under any of the analyzed alternatives.
Carbon County	ACEC	BLM Handbook 1613 provides that existing ACECs are to be reconsidered in the planning process, they were not. Handbook 1613 further provides, "If, however, there are issues associated with the management of the potential ACEC, the alternatives analyzed in detail shall reflect a reasonable range of management prescriptions for the potential ACEC." This was not accomplished in this document.	See GCR 127.
Carbon County	ACEC	The ACEC tool was intended by Congress to be limited in its scope to areas where it was necessary to protect and prevent (not either/or) irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes or to protect life and safety from normal hazards. The designation is not appropriate when relevant values are merely subject to some impairment. The threat must rise to a level of actual damage. Damage that is threatened or that is temporary does not fit the criteria for consideration as an ACEC. Oil and gas or grazing operations are temporary and have only a temporary effect on the landscape and should be allowable with appropriate stipulations and reclamation standards.	See GCR 153.
Carbon County	ACEC	Reference to the proposed Range Creek ACEC in Appendix 26: It states that this ACEC contains 80,632 acres, the chapters refer to the area as containing 64,504 acres, what is the real size?	The inconsistency in acreages between Appendix 26 and Draft RMP/EIS text has been resolved in the Proposed RMP/Final EIS.
Carbon County	ACEC	P 4-522, Range Creek ACEC: To enhance preservation does not support the congressional purpose of this designation, the act states to protect and prevent irreparable damage. Enhancement of preservation inferred that protection is already in place over the area. Existing policies and regulations are in place to protect resources the added layering only accomplishes management gridlock. Many examples have been shown to refute the validity, usefulness and need of the layering management policies. Cumulative impacts because of the legality and exposure to protest actions and litigation of this technique should also be considered. Management plans created individually, to address the uniqueness of each area, in cooperation and in coordination with the affected counties would create a management plan to accomplish the needed actions without layering management.	See GCRs 30 and 37.
Carbon County	Alternative Maps	In Map 2-52, Transportation Utility Corridors Alternative B and D. This map also fails to show the existing gas pipeline corridor along Nine Mile Canyon.	The BLM recognizes valid existing Rights-of-Way. The Transportation Utility Corridor Maps show only existing approved corridors. Not all ROWs such as the Nine Mile Canyon gas line are corridors.
Carbon County	Cultural Resources	Appendix 5, Objectives for Cultural Resource Management Categories: In the objectives portion of the Appendix it appears not to be a general guideline, but a prescription for each of the management categories.	Draft RMP/EIS Chapter 2 notes that allocation of cultural resources to a management category will be made during implementation and activity-level planning. Allocations at the implementation level will be recommended by appropriately qualified staff professionals, proposed by a planning interdisciplinary team according to NEPA, and decided by the Field Office manager. When allocated to a use category, the objectives for cultural resource management categories noted in Draft RMP/EIS Appendix 5 would be applied. These objectives are not simply general guidelines; they are management direction for specific cultural resource sites.
Carbon County	Cultural Resources	The Traditional use Category, (Appendix 5): No mention of cultural users or the involved local government or	Management objectives for cultural sites allocated

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		affected agencies. Impacts to any cultural use to our county will be addressed by the Commission. It is also expected that the SHPO be involved.	toTraditional Use are sufficiently broad as they include “traditional user groups”. In Chapter 2, such language is also present, including coordination with “tribes and/or other cultural groups” in identifying and managing traditional cultural properties. As no traditional cultural properties have officially been identified, specific impacts cannot be analyzed.
Carbon County	Cultural Resources	Chapter 1, Section 1.6 of the Draft RMP/EIS identifies planning issues; Carbon County made suggested language changes to 12 of the identified resources.	None of language changes suggested by Carbon County have been incorporated in Section 1.6 of the Proposed RMP/Final EIS. The reason that these changes have not been made is that BLM has revised and shortened the section. With the rewrite, the suggested changes are not necessary.
Carbon County	Cultural Resources	2.2.4, Cultural, Add: Cultural resources also include the historic uses and lifestyles on man and his work on the land. This plan will support and protect the ability for this to continue without undue impact.	The suggested language has not been added because the definition of cultural resources used in this document (see Glossary) includes “historic human activites”. Therefore, the added language would be redundant.
Carbon County	Cultural Resources	Cultural Resources, page 2-34, Goals: This Goal needs to recognize that man 's use of the land is a cultural and historic resource. The language added in the goal should be in the final draft to protect this resource equally: Preserve and protect significant cultural resources and ensure that they are available for appropriate uses by present and future generations (FLPMA Section 103(c), 201(a), 202(e); National Historic Preservation Act [NHPA] Section 110(a); Archeological Resource Protection Act [ARPA] Section 14(a)), Recognizing that man's continuing uses of the land on going over a period of many years is also a cultural and historic resource to be protected. Identify priority geographic areas for a new field inventory, based on a probability for unrecorded significant resources to reduce imminent threats from natural or human-caused deterioration or potential conflict with other resource uses (ARPA Section 14(a); NHPA Section 106, 110).	The definition of cultural resources used in this document (see Glossary) is from law and BLM policy. BLM will continue to manage cultural resources according to existing law and policy.
Carbon County	Cultural Resources	Section 2.16, Cultural Resources Management Categories, page 2-35: The priorities are not acceptable because they do not account for priorities if areas of concern or importance do not actually exist. Example: a Nine Mile Canyon and Range Creek inventory should be a priority.	The priority list has not been adjusted because the first two areas would include any known or potential area of eligible cultural sites including Nine Mile Canyon and Range Creek.
Carbon County	Cultural Resources	Section 2.16, Management of Traditional Cultural Properties: page 2-36; Add bullet: BLM would coordinate with SHPO,the state and local counties and/or county staff representatives to identify impacts of managing traditional cultural properties to help mitigate any possible negative impacts.	The bullet was not added to the Proposed RMP/Final EIS because consultation with SHPO and coordination with state and local governments is required by law and is not necessary in the RMP.
Carbon County	Cultural Resources	Chapter 4; CULTURAL RESOURCES, Assumptions; page 4-92: Carbon County disagrees with the third assumption because in the case of the Range Creek takings, the artifact robbers walked in a number of miles to take cultural treasures on the Wilcox Ranch. Pubic knowledge and media hype is our biggest problem.	While site specific examples exist of vandals and robbers exerting great effort to access cultural resources, such examples are rare and usually limited to high-profile resources such as Range Creek Canyon. The assumption that the level of vandalism and theft of cultural resources is related to the distance from routes is associated with more

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			common events of vandalism such as casual and/or uninformed users.
Carbon County	Cultural Resources	Chapter 4, Cultural Resources; New Field Inventories: page 4-100: The county's concern, based on past BLM actions, is that resource users are delayed in their activities, and often the cost to mitigate cultural sites is overwhelming.	The decisions related to new cultural resource field inventories are to prioritize areas in which to implement inventories required under NHPA Section 110. This decision does not include cultural resource inventories required under Section 106.
Carbon County	Cultural Resources	Management of Traditional Cultural Properties: page 4-111, Decision Background: This type of resource could also belong to the progeny of settlers or other affiliated groups. The local counties should also be involved and notified on action of this nature. This decision would be appropriate with added language: Traditional cultural properties are a type of historic property of traditional, religious, and cultural importance to an Indian tribe. The involved county will also be notified and consulted. The following decisions provide direction for the management of cultural resources. These decisions are included to clarify standard operating procedures.	The Proposed RMP/Final EIS includes Section 5.2 clarifies traditional cultural property.
Carbon County	Cultural Resources	p. 4-112, Impacts to Cultural Resources: Alternative D preferred, with appropriate language added: With notification and consultation with the affected county. Seeking agreements with Native American Tribes or other cultural groups could result in long-term impacts that are not quantifiable. These agreements could allow identified cultural resources to be identified and preserved for traditional, spiritual, or other uses.	The suggested additional language is decisional and not appropriate in an impact analysis. Additionally, agreements between BLM and Native American Tribes do not require consultation with local governments.
Carbon County	Fire and Fuels Management	Chapter 4,FIRE AND FUELS MANAGEMENT, page 4-215, Actions Common to all: Stronger language needs to be inserted to for the need to coordinate and consult with the county.	The existing language provides for such coordination. Counties are one of many agencies BLM coordinates with as required by FLPMA, NEPA, and other laws and regulations. This requirement for consultation is common to all RMP alternatives.
Carbon County	Fire and Fuels Management	Fire and Fuels Management:, page 2-50, Goals: amend “Manage fire and fuels to protect watersheds, life, firefighter safety, property, and critical resource values”. Add to Common to all Alternatives: “Work with partners in the WUI in wildland firefighting, hazardous fuels reduction, fire prevention and education, and technical assistance”. Hazardous fuels reduction: Add : “Integrate forests as part of viable, robust, and sustainable economies in the planning area, forests should contain a diversity of timber species, disease or insect infestations in forests should be controlled using logging or other best management practices.	The goal has not been amended because watershed is already mentioned since it is considered a “high resource value”. Under Actions Common to All Alternatives, Table 2-10 has been amended. The use of forest resources is addressed under the forestry and woodland products heading.
Carbon County	Forestry and Woodlands	Section 2.16, Actions Common to All Alternatives, P.2-55: Add; “Coordinate the development and implementation of FWMP with local counties and appropriate State agencies”.	The suggested language is not necessary because implementation plans, including the FWMP, would be developed in accordance with applicable laws, regulations and policies which would include public participation and county and state coordination.
Carbon County	Hazardous Materials	Section 2.16; Hazardous Materials and Waste: Need to add that BLM would inform the affected Counties and State agencies on these actions and keep them advised for the protection of our residents. p.2-137.	“Work with other agencies in rapid response to HazMat releases.” has been added as an objective to Table 2-23 of the Proposed RMP/Final EIS.
Carbon County	Lands and Realty	1.6.11 Lands and Realty: Add bullet: Allow for sale of property to land owners for the purpose of adjusting boundaries and clearing legal titles of land ownership with terms as allowed in FLPMA, section 1713 (j) (2) “to recognize equitable considerations or public policies, including but not limited to, a preference to users, he may sell those lands with modified competitive bidding or without competitive bidding. In recognizing public policies,	Section 1.6 is a summary of Lands and Realty planning issues raised by the public, organizations, tribal governments, federal, state, and local agencies as well as BLM resource specialists

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		the Secretary shall give consideration to the following potential purchasers: (3), adjoining landowners.	throughout the planning process. Land Tenure adjustments (land ownership changes) are identified as one of the planning issues. The criteria for land tenure adjustments are described in Table 2-16.
Carbon County	Lands and Realty	2.3.4 Lands and Realty: Add: Allow for sale of property to land owners for the purpose of adjusting boundaries and clearing legal titles of land ownership with terms as allowed in FLPMA, 1713 (f) (2) "to recognize equitable considerations or public policies, including but not limited to, a preference to users, BLM may sell those lands with modified competitive bidding or without competitive bidding._while recog nizing public policies, the Secretary shall give consideration to the following potential purchasers: (3), adjoining landowners.	The language has not been added because Table 2-16 of the Proposed RMP/Final EIS allows for the sale of lands identified in Appendix H. The sale of any other lands must first have a land use plan amendment.
Carbon County	Lands and Realty	Section 2.16; Lands and Realty: Goals- page 2-88: Add the following: "To sell or trade out certain public lands, clearing titles on private lands and making management of public lands more efficient."	The concept of managing and protecting public lands better through land tenure adjustments has been added to Table 2-16 of the Proposed RMP/Final EIS.
Carbon County	Lands and Realty	Section 2.16; Lands and Realty; Goals: Carbon County provided specific language to be added to the Land Tenure Adjustment Criteria related to coordination with the County.	The specific language was not added because it relates to the coordination with the County which BLM must do and not the specific details on when a LTA could occur.
Carbon County	Lands and Realty	p. 4-386: Common to all Alternatives: Appropriate with added Language: To sell or trade out certain public lands, clearing titles on private lands and making management of public lands more efficient. An action that reduces the net amount of private lands in Carbon County is not appropriate and not consistent with County plans. Comply with goals and objectives for resource management prescribed in the RMP. Requests will be processed on a case-by-case basis, with consideration given to the goals, objectives and decisions of this RMP and applicable County and state plans. BLM will comply with existing county plans and encourage No Net Loss of Private Lands or Tax Base. BLM, when considering an acquisition of private lands will make available for private acquisition an equal amount of public land and water rights as a condition of their purchase of the private land.	The Lands and Realty management actions under the "Common to All Alternatives" (Table 2-16) do not specifically prescribe actions that would reduce the net amount of private lands in Carbon County. Under the Lands and Realty program, certain portions of public lands would be disposed and private parcels could be acquired. The preferred method of land tenure adjustments is land trade. Regarding consistency with county plans, in Section 1.1 of the Draft RMP/EIS BLM commits to coordinating the management of public lands within the Price Field Office with other land management agencies, Carbon and Emery counties, municipalities, and private entities. It is also stated that, "Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act" (FLPMA, Sec 202(c)(9)).
Carbon County	Lands and Realty	Lands and Realty 'Management of Acquired Lands, page 4-390, Decision: BLM would comply with County plans by notifying Carbon County prior to purchase of any land acquisition, giving the County an opportunity to follow our goals and objectives.	In Section 1.7 of the Proposed RMP/Final EIS, BLM commits to coordinating the management of public lands within the Price Field Office with other land management agencies, Carbon and Emery counties, municipalities, and private entities. BLM would coordinate with Carbon County during the

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			NEPA process for any land transaction.
Carbon County	Lands and Realty	ACEC, VRM and any other layering stipulation are not acceptable to restrict Utility ROW's.	"Layering" is necessary because BLM National planning and program guidance requires that planning decisions be made for each program. Corridors and ROW avoidance and exclusion areas must be identified during planning to protect resources and uses under the objectives of the RMP. As required by FLPMA, the RMP must be consistent with State and local plans to the maximum extent consistent with Federal law and the purposes of FLPMA. Consistency with State and Local plans is addressed in Chapter 5 of the Proposed RMP/Final EIS. See GCRs 29.
Carbon County	Livestock Grazing	Throughout this document grazing is referred to negatively in such a way that a citizen wishing to make a comment on the RMP would be so inclined after reading the BLM's references to grazing in the DEIS.	See GCR 33.
Carbon County	Livestock Grazing	In the DEIS, even though much of the data is present to show continued range improvement since the last RMP/MFP, the DEIS never acknowledges by a comparison statement that the land is generally continuing to show improvement, even through periods of drought. This document nowhere takes into account or enumerates that much of the wildlife habitat, watering facilities and existing vegetation is a direct result of the livestock permittee's work.	Chapter 3 and 4 of the Proposed RMP/Final EIS have been changed to note the use of livestock guzzlers by wildlife and the impact to wildlife if livestock permittees no longer maintain the improvements. Draft RMP/EIS page 3-42, Table 3-23 shows that over 90 percent of lands on which Rangeland Health Assessments have been completed are functioning. Table 3-26 on Draft RMP/EIS page 3-45 notes the changes in livestock grazing since the last land use plans.
Carbon County	Livestock Grazing	Within the Grazing portion of the DEIS (Chapter 2, page 2-51 is a proposed action labeled Criteria for Voluntary Relinquishment and Disposition of Grazing Permits or Grazing Preference. It is Carbon County's position that this is contrary to policy.	See GCR 82.
Carbon County	Livestock Grazing	Why were the cattle really removed? No data existed in the 1984 MFP to substantiate this action. Couldn't rest rotation, or a change in season of use relieve this concern, or possibly a change in the flows in the Green River have caused this to happen also? What about other impacts that might have occurred to cause the action? What does this have to do with surface water quality? Is coliform itself a health hazard? How did the older trees grow with a 100-year history of cattle grazing on the Green River? Or is this problem from recent elk introduction? Does fecal coliform exist in Rock Creek? Is it a health risk? Or is this statement added to somehow justify the impacts on the permittee by the BLM who, by slow, questionable attrition has taken complete use of this area away from a legitimate rancher?	See GCR 105.
Carbon County	Livestock Grazing	Richard Denton and Bill Moellmer with Utah Water Quality explained to us that fecal coliform to fecal streptococcus ratios are not the most conclusive method of confirming the identity of species. This science, in fact it is an archaic approach. An accurate finding using this method (which is not close to 100% reliable) calls for strict temperature controls on the sample and allows only a 6-hour window before incubation, which is for 24 hours. Taking samples out of Desolation Canyon would make getting into the lab within that window questionable. Additionally, given the right conditions, (ambient and soil temperature with a certain level of humidity) even soil could show fecal coliform bacteria. Given this information, and by stating " cattle as being the most likely source	See GCR 105.

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		of this pollution," also doesn't take into account or inform the public that cattle are only in the area for about 4 months out of the year, where Elk and deer are in the area all year long, and not herded, so no management is present.	
Carbon County	Livestock Grazing	In section 2.3 RESOURCE USES, it states, "These uses include forest and woodlands, livestock grazing, recreation, lands and realty, and minerals and energy development." In many areas throughout the DEIS BLM attempts to pit livestock use against wildlife. If wildlife populations are competing for grazing AUMs against livestock, and BLM allows DWR or sports groups to continue buying out grazing allotments to retire them for conservation, using a resource for one sector's gain, then in that context wildlife should not be considered as a resource and should be treated to the same use type stipulations and requirements as all other commercial resource uses. Carbon County's position is that it is illegal for BLM to permit this action under the Taylor Grazing Act, pursuant to DOI Solicitor William Myers opinion and the 1999 1Oth circuit court decision. This EIS must be prepared to address these impacts. Accurate numbers of wildlife need to be accounted for. Issues of trespassing onto other allotments by wildlife should be prosecuted, and the associated forage losses should be compensated, as BLM does with illegal livestock use. This alternative should be carried throughout the DEIS pertaining to this issue. Carbon County does not support this type of action. It is our position that in this issue, alternatives should be given to the public review process that would promote actions to increase the health of the land, such as cooperative management planning and cooperative monitoring through consultation, cooperation and coordination to benefit both livestock and wildlife use.	See GCR 83.
Carbon County	Livestock Grazing	The Range Creek Grazing Allotment and the ACEC layer propose the transfer of the AUM's to wildlife use, and adding it to the Grey Canyon WMA will not benefit wildlife. Long-term this action will prove to degrade the land by lack of stewardship and a lack of maintenance on existing range improvements.	Table 2-14 in the Proposed RMP/Final EIS have been modified to allow for livestock grazing of the Range Creek allotment.
Carbon County	Livestock Grazing	The DEIS attempts to remove a very large area within the existing grazing district from the status of "chiefly valuable for grazing" by using the language, " lands no longer available for grazing" to accomplish this, even in the land use planning process.	The RMP does not propose to remove large areas from grazing. The Proposed RMP/Final EIS has been revised to clarify this. The document is formally incorporating previous decisions into the plan. For example when the Grey Canyon Wildland Management Area was created it excluded grazing.
Carbon County	Livestock Grazing	It does not show loss of the existing economic infrastructure throughout the resource area when ranchers can no longer use or acquire these allotments. BLM doesn't address the feasibility, or the impact of a young rancher no longer being able to acquire grazing privileges to continue this traditional lifestyle. It does not reveal the cumulative impacts to the community in loss of sales and services caused by the proposed actions, the loss of the additional income or the future foreseeable income potential.	See GCR 132.
Carbon County	Livestock Grazing	Appendix 2 (Grazing portion); implies that Alternative D would apply no matter what changes are made during public comments.	The Appendix refers to Alternative D of the Draft RMP/EIS as it is the preferred alternative. Appendix B in the Proposed RMP/Final EIS states that grazing will be managed according to the Proposed RMP.
Carbon County	Livestock Grazing	Chapter 1, 1.6.9 Livestock Grazing: in the opening statement add to the front of the next to the last sentence: BLM will continue to monitor with utilization and trend studies, to identify and address in cooperation with the permit holder any instances of resource degradation occurring in site-specific areas. Degradation, particularly associated with seasons of use and forage allocation will also be addressed when identified on an allotment level basis. This RMP will also ensure resolution of rangeland health concerns by addressing the following: etc. Amend the 2nd bullet to read: " Evaluate forage needs for livestock, and readjust wildlife, and wild horses and	See GCR 83.

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		burros numbers to maintain the historic AUM levels, and balance wildlife habitat needs for protection of riparian and watershed values." Add 3rd bullet to read: "Work with grazing permit holders as outlined in the Memorandum of Understanding concerning cooperative rangeland monitoring to improve quality and quantity of short and long-term allotment level monitoring information from which to make decisions."	
Carbon County	Livestock Grazing	Section 2.16; Livestock Grazing; Common to All Actions; Lands Allocated for Grazing; page 2-57: This section is illegal. Lands within grazing districts were reserved specifically for grazing and will continue as such until a finding and withdrawal is made by the Secretary that identifies the land as no longer chiefly valuable for grazing. This action cannot be done at the Field Office or State level. Additionally, to retire allotments for conservation use is also illegal.	Table 2-14 (Livestock Grazing -Common to All Actions) in the Proposed RMP/Final EIS has been revised and this specific has been removed.
Carbon County	Livestock Grazing	Section 2.16; Livestock Grazing; P.2-58; Horseshoe Canyon South Allotment: We suggest placing in this summary, the number of AUM's for each allotment, and the acreage involved next to the allotment name, to show the actual loss of active AUM's in the grazing district. Range Creek and Buckskin Allotments P.2-58: Carbon County suggests that the Range Creek Allotment be put out to application by a local rancher, to conform with the intent of the TGA. Forage in the Buckskin Allotment would be allocated to other resource uses. (56 AUMs). The private land that this allotment is attached to is being considered for yet another land trade and these AUMs should stay in private livestock use.	The Proposed RMP/Final EIS has been changed. In the Proposed RMP, the Buckskin allotment would remain open for livestock grazing in conjunction with other private land in the allotment. The Range Creek allotment would remain open for livestock use upon development of a prescriptive management plan including UDWR lands that would provide for wildlife objectives cooperatively developed by BLM and UDWR. The number of AUMs and acres for the Horseshoe Canyon Allotment have not been included because this was a previous decision.
Carbon County	Livestock Grazing	Chapter 4, Soil, Water, Riparian impacts to livestock grazing; 4-51: Grazing can damage riparian areas. Good herd management is the key to mitigation. Continued pasture rotation is a good method to alleviate much of the problem. Many of the resource area permit holders are now enjoying the benefits of good grazing management. The cumulative impact of grazing with appropriate management is the creation of larger areas in proper functioning condition.	This impact is discussed on page 4-276 of the Draft RMP/EIS.
Carbon County	Livestock Grazing	Chapter 4, Vegetation Impacts to Livestock; 'P.4-57: We are not sure what the last sentence entails? The overall basis of this planning action would be acceptable, with the understanding that livestock displacement is only temporary, and delaying is also not a permanent conclusion for livestock in this analysis. Horse reduction would also help to move this action to the intended goal. This action done after a Horse removal process, and in better climatic years, can cumulatively be a valid range improvement technique.	In Section 4.3.2 of the Proposed RMP/Final EIS the analysis of vegetation impacts to livestock grazing has been revised.
Carbon County	Livestock Grazing	In alternative D Impacts to Livestock, p. 4-170: If UDWR acquires additional habitat or if studies indicate that additional forage is available naturally, supporting increasing wildlife populations is not anticipated to significantly change the amount of permitted use. The sentence is arguable at least, It is illegal for DWR to acquire allotments. It is also not legal to use them for conservation use. Additional habitat means forage, and that forage is to be used by the preferenced user until all of the given AUM's are satisfied, then the excess forage can be split equally between livestock and wildlife. Any use that reduces or changes a permit is significant. It calls for an amendment to the AMP in coordination and consultation with the permittee. It also gives the permittee 30-days to comment and more time to protest the decision. Allotments with overlapping crucial habitats could change the season, duration, and levels of use for livestock grazing. In coordination and consultation with the permittee, this is a reasonable action. Changing the season of use may influence the quantity and quality of forage available for livestock grazing. If the	Impact analyses were revised to reflect changes in the alternatives and to improve the clarity and readability of the document.

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		forage quantity and quality decreased, livestock productivity may decrease. This is a reasonable assumption.	
Carbon County	Livestock Grazing	Decisions, p. 4-275: In the last bullet, what does the term unallocated lands mean?	The term "unallocated lands" means lands that are currenly open for livestock grazing but that are not currently authorized for grazing under an active permit.
Carbon County	Livestock Grazing	LANDS NO LONGER AVAILABLE FOR LIVESTOCK GRAZING – PROGRAM SUMMARY UPDATE, page 27: This is not consistent with county plans. We submit that before land in a grazing district becomes "no longer available for grazing," BLM has the burden to show by documented monitoring and scientific data that the health or other factors of this land will no longer support livestock. Slip. Op. at 14. The Court went on to note that a land use plan that denied grazing privileges would be subject to judicial challenge (id), and this notion was emphasized in Justice O'Connor's concurrence. O'Connor Concurrence at 2. BLM should also attempt to mitigate the loss pursuant to Sec 4110.3-2 (b) and, or Sec. 4110-3-3 (a). Implementing reductions temporary closure in permitted use: The TGA adequately addresses temporary reduction or closure due to certain conditions making the removal of grazing use unnecessary. Losing AUM's long term has caused much economic hardship for many ranchers and the local economies in the west. It is understood that grazing allocations may be adjusted for protection of resources on the public lands. It is our contention that to temporarily rest an area is healthy for the land; to lose livestock use on lands that have been historically grazed for 100+ years will change the ecosystem of the land and take away the present stewardship. This can have adverse and sometimes devastating effects on the long term health of the land. In many places it has caused wildlife numbers to reduce. Cumulatively, losing grazing permits can cause ranchers to go out of business, selling their private lands to development, causing the loss of more productive private lands that would impact larger numbers of wildlife and watersheds. For these reasons as well as others, designating lands no longer available for grazing is an un-acceptable action. Further this action is not consistent with good land management, and Carbon County's Plans.	See GCR 83.
Carbon County	Livestock Grazing	CRITERIA FOR VOLUNTARY RELINQUISHMENT AND DISPOSITION OF GRAZING PERMITS OR GRAZING PREFERENCE, p. 4-275: Not consistent with county plans. 1. Other uses of the land serving public benefit; Grazing preference is not subservient to other uses. The Supreme Court concluded that, under the existing regulations, "a permit holder is expected to make substantial use of the grazing permit and that "the Secretary has represented to the Court that '[a] long-standing rule requires that a grazing permit be used for grazing.' Slip Op. at 18-19. 2. Adverse terrain characteristics such as steep slopes. Even in an allotment with steep slopes, wildlife will still be able to forage these slopes whether livestock is present or not. 3. Sensitive soil, vegetation, or watershed values; Generally all of these potential threats to the health of the land increases when grazing is removed, however since monitoring stops when grazing is removed no one knows. 4. Presence of noxious or poisonous weeds and other undesirable vegetation…80% of noxious or poisonous weed management in Utah is done by farmers and ranchers, and with personal funds, or program money that only they are eligible to receive. 5. Presence of other resource values that may require special management/ protection; Most resource values are managed better with grazing present. 6. The need for establishing grazing reserves. The Utah RAC removed this issue during the hearings on the Sustaining Working Landscapes Initiative last year, making this an inappropriate decision, without policy support. This action is not consistent with County Plans. The first announcement of this action was in this DEIS, and without IDT review, which circumvents NEPA. The fact that this appears to be a creation of a policy that was not	See GCRs 29 and 82.

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		announced through the Federal Register or given a comment period on its own merits, inserted into only one DEIS throughout the west. And added to a DEIS whose demeanor reflects a direct bias for livestock grazing, to anyone reading the document, would point to an agenda. Possible reconsideration of this action might be in order.	
Carbon County	Livestock Grazing	Common to all Alternatives, Impact Analysis 4-276: Add the following information: "Livestock hoof actions on soils would break down vegetation and the upper crust of soils. This would lead to compaction and breakdown of soils that would result in an increase in erosion. In dense herd situations this is true, but on open range, only small areas around water and minerals are impacted in such a manner. Generally hoof action on open range tends to hold water from rain and slows runoff. Hoofs of all animals can break surface crusting needed for seedling penetration and water permeation on much of the soils that is present in the resource area, cumulatively increasing vegetative density and decreasing erosion."	The requested language was not added to the Proposed RMP/Final EIS because it applies to certain specific conditions but is not appropriate for a general RMP analysis of impacts of the decisions.
Carbon County	Livestock Grazing	Impacts to Vegetation Resources, p. 4-276: Livestock grazing impacts vegetation by direct removal and through compaction of soil from hooves or concentrated use (e.g., near salt blocks, watering areas, and shade). Grazing affects on vegetation depend on the interaction of several factors. Antelope do the same thing on the desert; and elk do it on the mountain. Since no wildlife monitoring is done, no reporting is needed. Again these are small areas. AUMs (the number of animals grazed), intensity (the number of animals per acre), duration (length of the grazing period), and season. Livestock can introduce noxious weed and invasive plant species by transporting them on their hooves, coat, and fecal matter. Wildlife do the same thing. But since cattle do not digest all of the hard solid seeds they consume, they plant more species, much of it preferred vegetation and indicator species to different locations providing an ideal seed bed for germination and growth. This transference of vegetation increases ground cover, reduces erosion and increases forage to wildlife as well as livestock. Utilization of grazing at the right time of year allows much of the noxious and unwanted exotic species of grass and weeds to be consumed before the seed has ripened, preventing the spread of unwanted vegetation.	The Proposed RMP/Final EIS acknowledges that animals can transport seeds.
Carbon County	Livestock Grazing	P. 4-276: Carbon County's position is that the requirements of the Utah BLM Standards for Rangeland Health are not placed on lands allocated to wildlife.	The Standards for Rangeland Health do apply to all lands and activities including wildlife.
Carbon County	Livestock Grazing	p. 4-276: Add "Wildlife presents a larger problem for noxious weed management. Elk as carriers of white top and musk thistle is documented. Permittees regularly spray and maintain weed management projects. State permittees pay for weed management through grazing fees. Area agriculturalists also pay through county taxes for the county weed management department to spray ranges. Areas where grazing is not ongoing will be left unmonitored for this problem".	Wildlife and other activites contribute to invasion and spread of noxious weeds. The analysis on page 4-276 however, deals with impacts of motorized access. Weeds and invasive species from all sources would be monitored and controlled throughout the PFO.
Carbon County	Livestock Grazing	p. 4-276: Leaving lands unavailable for livestock grazing unallocated would not impact vegetation resources. Allotments reallocated for wildlife or watershed benefit would not impact vegetation resources. This Statement is not valid. On lands unallocated for grazing, vegetation would be impacted cumulatively, through morbidity and non-disturbance and lack of stimulation as well as range improvement neglect. Allotments reallocated for wildlife or watershed benefit would be impacted, by nonuse non-management or over use, wildlife will either over use some places or not use others, the improvements usually are not maintained, causing part of the concentration problems and vegetative monitoring and trend studies are not done. This data pointing to livestock damage and not recognizing wildlife damage will skew the analysis.	BLM records do not show any large scale morbidity within the PFO. Concerning grazing that is relinquished or areas that are unallocated: historically livestock grazing has been the dominant forage consumer and wildlife use has been a lesser forage user in most allotments. Livestock tend to concentrate on lower elevation water sources and flat terrain areas. Wildlife more effectively utilize steep and rough areas that livestock tend not to use. On unallocated areas wildlife numbers would remain relatively at the same management

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			population levels. Therefore, vegetative cover and production would presumably increase toward a more natural potential and the impacts of livestock would be eliminated. Range improvements would be removed unless required by wildlife or other resource needs in which case range improvement projects would need to be maintained by the BLM or others.
Carbon County	Livestock Grazing	p. 4-277. Overgrazing was widespread 100 years ago. A history of accomplishments on the range is recorded in photography to illustrate the improvement in our resource area. Grazing has influenced the plant communities. In fact grazing in the west is its own "ecosystem ". It has created the environment that is supportive to many of the resource values. Removing this historic use can cause the same negative affects to the plant communities and the watersheds that the impact analysis has been blaming on the grazing.	Impact analyses were revised to reflect changes in the alternatives indicate that vegetation could change if a way that would affect some resources including vegetation if livestock grazing were removed.
Carbon County	Livestock Grazing	Chapter 4, Livestock Grazing impact on Desolation Canyon recreation, page 4-280, Decision Background: This statement is unfounded and subjective.	This section has been removed from the Proposed RMP/Final EIS because it was unnecessary.
Carbon County	Livestock Grazing	Opportunities to Eliminate Livestock Grazing to Provide More Wildlife Forage: page 4-292. Decision Background: Opportunities exist to eliminate some livestock grazing to provide more forage and habitat for wildlife species, particularly deer and elk. This is not consistent with County Plans it is also not legal.	See GCRs 29 and 83.
Carbon County	Livestock Grazing	Administrative Access-Maintaining Motorized Vehicle Access for Range Improvement Construction and Maintenance: page 4-297: The no action Alternative is preferred. Access for existing and future range projects would continue to be allowed on an allotment basis. In Chapter 1, Planning Criteria 1.5, on Page 1-7, it states, "BLM will continue to consider administrative access on a case-by-case basis."	See GCR 104.
Carbon County	Livestock Grazing	p. 4-301, Impact Analysis: An alternative should be written pursuant to the applicable law. Loss of grazing preference by not making the allotments available for application for use is a violation of Section 325g TGA, "Where such lands are located within grazing districts reasonable notice shall be given by the Secretary of the Interior to any grazing permittee of such lands." "Secretary of the Interior, shall entitle the applicant to a preference right to enter, select, or locate such lands if opened to entry as herein provided."	It is within BLM's authority to allocate forage in allotments that are currently not under any permit. The Price Field Office RMP determines the allowable uses of the public lands as provided for in FLPMA. FLPMA states in section 202(a) that land use planning provides for the use of the public lands "regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses". FLPMA further provides in Section 202(e) the authority to issue management decisions which implement newly developed or revised land use plans. Such decisions, including those that exclude one or more uses, are subject to reconsideration, modification and termination through revision of the land use plan. According to section 2 of the TGA, it is the objective of the act to regulate the occupancy and use of the Grazing Districts and to preserve these lands. The Grazing Districts were established through a classification system established in the TGA. Under FLPMA, uses of the land are allocated

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			during the land use planning process. The combinations of uses proposed in the Price RMP are varied and diverse across the planning area taking into consideration the current and future needs of the public. This is consistent with both FLPMA and the TGA. Permittees will continue to hold preference to grazing permits on the allotments allocated for livestock use within the RMP and proper notice will be given under 43 CFR 4160 if any change to their permit is taken.
Carbon County	Livestock Grazing	ACEC Impacts to Livestock, p.521: In all alternatives the amount of AUM's and the specific allotments and operators should have been named as to the impact implication.	Section 4.3.2 of the Proposed RMP/Final EIS has been modified to include the AUMs that would be affected by the ACEC designation in addition to the acreage. To list the specific allotments and operators is unnecessary.
Carbon County	Livestock Grazing	Grazing Management in Pronghorn Ranges, page 2-41: Alternative D is acceptable with the following added language: Recognize and coordinate with valid existing rights and holders of grazing preferences, current livestock-grazing prescriptions would continue and, where opportunities exist, would be adjusted to enhance forbs production on pronghorn antelope ranges. (Same as No Action Alternative).	See GCR 103.
Carbon County	Livestock Grazing	Sheep Grazing In/Near Bighorn Sheep Habitats; P.2-41: No Action Alternative is acceptable with the added language: Recognize and coordinate with valid existing rights and holders of grazing preferences, change in class of livestock from cattle to domestic sheep would be prohibited in currently identified bighorn sheep habitat.	See GCR 103.
Carbon County	Livestock Grazing	Reallocate AUMs Between Wildlife, Wild Horses and Burros, and Livestock or Other Resources; page 2-61: The preferred Alternative (D) should be amended to reflect Congressional language as follows: When monitoring data and best science identify an increase in available forage in I-IMA's which are in Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUM's to levels historically designated when the grazing district was established then any excess available forage will be reasonably_ allocated between horses/burros and wildlife. For increases in available forage in I-IMA's which are not in grazing districts, allocations would be adjusted proportionately among wild horses/burros, wildlife and any permitted livestock use in the area. When monitoring data and best science identify a decrease in available forage in HMA's which are in Taylor Grazing Act grazing districts, such decrease will first be allocated between wild horses/burros and wildlife in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decreases in available forage in HMA's which are not in grazing districts, allocations would be adjusted proportionately between wild horses/burros, wildlife, and an permitted livestock use in the area.”	See GCR 83.
Carbon County	Livestock Grazing	Section 2.16; Livestock Grazing; Forage Allocation Within Lands Acquired After Adoption of the PFO RMP; page 2-61: Grazing could be used, if not acquired for that purpose, to assist in rangeland management using best management practices.	Nothing in the Proposed RMP would limit BLM’s authority to implement 43 CFR 4110.4 and 4130, which include authorization of livestock grazing on acquired lands.
Carbon County	Livestock Grazing	Administrative Access-Maintaining Motorized Vehicle Access for Range Improvement Construction and Maintenance; page 2-62: No action Alternative is preferred. Access for existing and future range projects would continue to be allowed on an allotment basis. In Chapter 1, Planning Criteria 1.5, Page 1-7, states, “BLM will continue to consider administrative access on a case-by-case basis.”	See GCR 104.

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Carbon County	Livestock Grazing	Livestock Grazing; Actions Common to All Alternatives, P.2-57: Add the following language to make this Appropriate: Manage grazing and rangeland health according to the Standards for Rangeland Health and Guidelines for Grazing Management, for BLM Lands in Utah, based on documented historical use and dependent on the availability of forage and water. Require livestock trail permit for any trailing activity that occurs on BLM-administered lands. Offer for application to graze, unallocated lands as available for livestock grazing unless documented and validated scientific monitoring shows that due to terrain, soils, vegetation, that the land is no longer chiefly valuable for grazing and is removed Dally by appropriate statutory authority. Management decisions will be pursuant to the TGA, PRIA, and CFR 4100.	BLM has carefully considered this comment and has made changes in the Proposed RMP/Final EIS as appropriate and where necessary, to reflect the elements raised by the comment.
Carbon County	Minerals and Energy Resources	Appendix 21; RFD: The estimated number of wells per year is an underestimation. It also doesn't consider or address the RFD if a new reserve is found, or new technology developed that would enable more drilling.	See GCRs 48 and 51.
Carbon County	Minerals and Energy Resources	Appendix 21; The appendix doesn't consider or use the EPCA policy in the DEIS. The Appendix should have mandated that the entire resource area be evaluated and inventoried for the RFD of mineral production capabilities as stated in EPCA.	See GCRs 51 and 52.
Carbon County	Minerals and Energy Resources	Appendix 21 and the data in the DEIS is not recent, as it mentions only that the EA is completed on the Stone Cabin 3D seismic. More information as to RFD potential from the latest developments would probably be appropriate in the DEIS for decision making processes.	Appendix 21 of the Draft RMP/EIS has been updated and included in Appendix M of the Proposed RMP/Final EIS. Appendix M includes more recent data on oil and gas development in the PFO.
Carbon County	Minerals and Energy Resources	Appendix 21: Carbon County contends that the estimated acres of disturbance to be some what inflated.	The estimate of acres of disturbance per well location in Appendix M of the Proposed RMP/Final EIS is used for analyses purposes in Chapter 4. The number is similar to that being used in the West Tavaputs EIS.
Carbon County	Minerals and Energy Resources	Appendix 23; Energy Policy and Conservation Act (EPCA): The Draft RMP/EIS did not adequately address the impacts of EPCA.	See GCR 52.
Carbon County	Minerals and Energy Resources	Appendix 25; Coal Report: A coal occurrence map should be prepared similar to those existing maps for other minerals.	A coal occurrence map has been added to the Proposed RMP/Final EIS as Map 3-25.
Carbon County	Minerals and Energy Resources	Section 2.16; Minerals and Energy Resources: Carbon County wants Valid Existing Rights recognized and BLM to comply with IM 2004-089.	Valid Existing Rights are recognized in Section 1.6 of the Proposed RMP/Final EIS. Compliance with IM 2004-89 is explained in Appendix M.
Carbon County	Minerals and Energy Resources	Chapter 4; Table 4-2. Price Minerals Reasonable Foreseeable Development (RFD); page 4-5; Alternative D: In all areas this Table is too restrictive for purposes of the RFD. The no action alternative is not conducive to foreseeing the RFD for proper cumulative impacts. The RFD fails to recognize current infrastucture.	Appendix M of the Proposed RMP/Final EIS has been revised and the number of well pads has been increased for the Proposed RMP/Final EIS to be consistent with Alternative A.
Carbon County	Minerals and Energy Resources	Mineral Resources, p. 4-320: Until such time as the semi primitive non-motorized class is dropped from the areas where existing roads and the wells with valid existing rights within the logical drilling unit boundaries are located, Carbon County will maintain that this is not a logical or accurate base on which to render a decision.	ROS designations apply to recreational activities and do not apply to permitted activities such as mineral development. However, at the time a lease is granted, stipulations may limit vehicle use.
Carbon County	Minerals and Energy Resources	Impact to Leasable Minerals, p.4-369: Some portions of the stipulations are quite restrictive. This should be more flexible to consider needed actions on a case-by-case basis involving resource needs.	See GCR 18. Appendix G of the Proposed RMP/Final EIS provides criteria for exception, modification and waiver.
Carbon County	Minerals and Energy	Minerals; page 4-419; Assumptions; Appropriate with amendments: In RMP review consider entire resource area,	Appendix M (RFD) of the Proposed RMP/Final EIS

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	Resources	as per IM2004-089. The number of wells for each alternative that would be drilled during the next 20 years is shown in Table 4-10. This amount is too conservative; past leasing shows about 127 wells per year.	addresses compliance with IM 2004-089. The new RFD addresses well locations rather than number of individual wells.
Carbon County	Minerals and Energy Resources	p. 4-420, Actions Common to All Alternatives; Appropriate with amendments: Consider withdrawal of areas as follows: - All areas recommended for withdrawal in the San Rafael RMP and Price MFP would be recommended for withdrawal in this RMP. ACEC 's are not consistent with county plans and not relevant for withdrawal purposes. The plan needs to survey the entire resource area and consider deeper mineral development potential for RFD per IM 2004-089. - Gordon Creek Wildlife Management Area (WMA) would be recommended for withdrawal from entry under the General Land and Mining Laws. If sub-surface use does not impact the surface as per the reasons for withdrawal, this action would not be reasonable. Only surface disturbance would be enumerated as restricted within the withdrawal document, and sub-surface use without surface disturbance should continue to be allowed. • Oil and gas leases would be managed under the stipulations that were in effect when the leases were issued (RMP, MFP, Combined Hydrocarbon EIS (1984), EA on Oil and Gas Leasing (1988), three EIS's addressing coal bed natural gas development ([1992, 1997, and 2001], FLPMA, etc.). • BLM recognizes the merit of off site mitigation strategies for the purposes of habitat enhancement. Add: BLM would encourage willing partners to participate in offsite mitigation strategies. • The site is presently listed or is eligible for listing in the Abandoned Mined Land Inventory System (AMLIS). • AML reclamation plans would not allow reclaiming activities to re-disturb areas that are meeting good resource management needs, in order to reconstruct or attempt to reconstruct the original area as it was, before it was used, creating a less stable land area. This will be determined on a case-by-case basis in cooperation and coordination with affected counties and state agencies. • AML hazards should be, to the extent practicable, mitigated or remediated on the ground during site development. The criteria used to establish water quality-based AML program priorities are as follows:2) The project reflects a collaborative effort with other land managing agencies, Add. in consultation and coordination with affected counties.	Offsite mitigation is only appropriate when the specific conditions of a proposed project make such mitigation appropriate. While the voluntary application of offsite mitigation is the general rule, there are circumstances where negotiation would be appropriate. In cases where one or more applicants in a specific geographic location have volunteered to perform offsite mitigation, it could be appropriate for other applicants in the same area to apply the same or similar offsite mitigation. The BLM requires onsite mitigation of impacts using best management practices consistent with rights granted.
Carbon County	Minerals and Energy Resources	Minerals; Conflicts between oil/gas development and Coal; p. 4-430; Impacts to the Nine Mile Canyon ACEC: This section appears out of place.	Discussion of the existing Nine Mile Canyon Pipeline in the Conflicts between Oil/Gas and Coal has been removed in the Proposed RMP/Final EIS.
Carbon County	Minerals and Energy Resources	Impacts to Minerals and Energy 4-524, 4-525; 1: ACECs would not be located in the oil and gas development area; therefore, impacts to oil and gas exploration and development from ACEC management actions would not be significant: This is consistent with county plans. In the Nine Mile Canyon (approximately 50,000 acres),management actions would require cultural resource inventories before oil and gas development would be permitted, which could decrease operator costs and would minimize the potential for costly delays in oil and gas exploration and development when cultural resources are identified, disturbed, or damaged during construction activities. The Nine Mile Canyon area would be open to leasing subject to minor constraints (controlled surface use), which would limit oil and gas development and explorations. Management actions would require development to meet VRM Class IV restrictions, which would place minor restrictions on the placement of oil and gas facilities. In cooperative planning this actions could be address on a case-by-case basis and a reasonable plan would be achieved. The cumulative impacts and expected conflicts would be reduced.	See GCR 18.
Carbon County	Minerals and Energy	Transportation and Access impacts to Minerals and Energy p. 4-574: Any action to do with access will have a	The transportation and motorized access common

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	Resources	definite affect on the ability to use the land.	to all management decisions do not propose any changes to the existing management as outlined in the Draft RMP/DEIS. Therefore, there would be no impacts to mineral and energy resources.
Carbon County	Minerals and Energy Resources	Conflicts in Areas with Oil, Gas, or Coal Bed Natural Gas As Well As Coal Resource Potential; page 2-98: On this issue in the DEIS the County objects because this may be masking shifts and movements between lands open only to one type of mineral resource, and lands open only to another energy or mineral source; it is impossible to determine, based on the DEIS.	The identification of priority energy resources in conflict areas to promote safe and efficient extraction of energy resources would occur on a case-by-case basis. Site-specific factors would determine the priority energy resource.
Carbon County	Minerals and Energy Resources	IM 2004-089 directs BLM to consider all of the lands in the resource area in the land use planning process. The RFD needs should be based on data encompassing the entire area to be consistent with Federal policy and County plans.	See GCR 53.
Carbon County	OHV Route Identification	1.6.10.1 Off Highway Vehicle Use, states: Existing OHV use categories and route designations will be reviewed and modified where needed to meet changing resource objectives. This DEIS cannot address this issue at this time. Only 2 IDT meetings were held to address route designation in Carbon County. We haven 't yet reviewed all of the routes within Carbon County, or evaluated the connectivity and consistency with adjoining Counties or notified them of this action. All of the routes shown on the road files submitted to BLM by Carbon County for the RMP, plus those ARCVIEW shape-files and maps also submitted by local OHV groups and others will be used by the County to determine open routes. The Carbon County Planning Commission reviewed the Master Transportation System Plan, which was added to the Master Plan for Carbon County on September 7, 2004. The Carbon County Commission held a public hearing and adopted the revised plan on September 15, 2004. The map was signed on September 20, 2004. The Carbon County Commission will determine, as needed, which routes can be used by ORV's on the public roads and right of ways in Carbon County. The County will consult and cooperate with BLM to prepare your route designation plan.	The ID Team has met several times during the RMP process and the development of the route designation in the Price River area was completed in cooperation and coordination with the effected counties and the BLM. Also see GCR 145.
Carbon County	OHV Route Identification	P. 4-376: OHV Use and Route Designation; Additional motorized and non-motorized trail systems will be considered on a case-by-case basis. Add: in cooperation and coordination with the affected counties.	Coordination is a basic premise as discussed in Section 1.7 of the Draft RMP/EIS and would occur on all adjustments to OHV route designations.
Carbon County	Process and Procedures	We are disappointed and dismayed that the draft was released with volumes of information and policy that were never disclosed or discussed in ID team meetings with Carbon, Emery, and State staff. We believe that the Price and State Office's failure to disclose this vital information and data has led to a situation of non-compliance with federal law and regulations.	Consultation and Coordination with State and local government as well as the public are described in Chapter 5 of the Proposed RMP/Final EIS. The BLM relied on internal and external scoping to define the range of alternatives, impacts and actions to address in Proposed RMP/Final EIS. Any particular concerns expressed by State and local government are responded to in Chapter 5. Any specific instance of perceived non-compliance with Federal law and regulations has been addressed.
Carbon County	Process and Procedures	We do not believe that you have developed a full range of alternatives in this draft plan. You did not consider an alternative which would reflect our point of view as to how these lands should be managed. If you had considered our Master Plan and the adopted plans of Emery County, with their precepts, you may have had a complete document. As is the Draft is incomplete.	See GCRs 2, 39, 130 and 137.
Carbon County	Process and Procedures	A RMP is designed to be a framework in which the main goals and objectives of future land management are enumerated. It should be flexible and provide for needed changes with consultation and coordination of local	See GCR 2.

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		governments and state agencies on a case-by-case basis for actions that may arise.	
Carbon County	Process and Procedures	Carbon County is concerned with the layering of one decision on another such as ACECs, SRMA, VRM,etc. That this can devalue private property and cause financial loss to the landowners and the local tax base by attrition. Another aspect of losing the land as an economic base is the loss of a culture and a traditional, unique and historic pattern of man's use of land in a manner, by layering of BLM management, could be lost for all time.	See GCRs 37 and 132.
Carbon County	Process and Procedures	Carbon County has previously developed its Master Plan related to privately owned lands in the County. This plan is now directed toward management of federally and state managed lands. With adoption of this Plan the County put into place a “Comprehensive Plan” which includes “all land within the jurisdiction of Carbon County.” The Carbon County Commission now calls upon the federal and state management agencies to coordinate in advance with the county, any proposed actions which will impact the county's custom, culture or economy in any way. This includes investment backed expectations of citizens of the County, the economic stability and historically developed custom and culture of the County, or provisions of the Master Plan. Such management agencies are requested to so coordinate their actions by providing to the Commission in a timely manner, prior to taking official action, a report on the proposed action, the purposes, objectives and estimated impacts of such action, and the economic impact. In other words, the County Commission requests no more from the federal management agencies than what is required by the federal laws governing their management processes as well as Executive Order 12630 issued by former President Reagan on March 15, 1988 and implemented by guidelines prepared for all federal agencies by the Attorney General of the United States.	BLM has coordinated with State and local government during the development of the plan and has committed to future coordination and consultation as plans are implemented. Consultation and coordination efforts are described in Chapter 5 of the Proposed RMP/Final EIS. Chapter 5 also responds specifically to comments on the Draft RMP/Final EIS and describes inconsistencies between the alternatives analyzed in detail and State and local plans.
Carbon County	Process and Procedures	Appendix 24: Multiple use Requires Multiple Management; Carbon County is concerned about the cumulative impacts by use of the various tools available to the BLM for management prescriptions within the Price RMP. This Appendix discusses this issue, but doesn't recognize that each of the programs and responsibilities of the BLM bring the need for management prescriptions.	See GCR 37.
Carbon County	Process and Procedures	Chpt. 1, 1.5: Add bullet point: Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.	The concept is included in Section 1.7 of the Proposed RMP/Final EIS.
Carbon County	Process and Procedures	1.6.10: The 4th bullet states: Management policies, regulations or instructional memorandums to provide for recreational uses of resources will not influence or denigrate uses allotted by valid existing rights, or by acts of Congress. Add: In relation to other resources, recreation does not contribute a majority of the income to the economy of the community. We agree that increased recreation would be a welcome addition to our economy and the RMP should plan and manage for it. However, when this planning action started, PFO attempted to promote recreation as an economic substitute for mineral development. This is simply not possible or true. Recreation is a viable industry and an accepted multiple use, but it is not worthy of the lofty goals set by this DEIS. It should not be used to drive the land planning process in this DEIS. Other uses are also substantial and should not be denigrated by a recreation agenda to the exclusion of other uses. This plan direction is not supported by any policy or regulation. FLPMA stipulates that BLM is a multiple land use agency.	See GCR 1.
Carbon County	Process and Procedures	Section 2.16; Wild Scenic Rivers, P.2-133: Carbon County is concerned about how water rights might be affected by a Wild and Scenic River determination of suitability. Further, all alternatives should recognize the State's ownership of the water and the Colorado Compact agreement, which by judicial decree could be endangered were any segments allowed to be designated?	Any Wild and Scenic River designations would have no affect on existing, valid water rights or water law. Section 13 (b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. The BLM fully recognizes the states authority over water

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			resources. However, this does not in any way preclude the BLM from fulfilling its mandate by Congress to consider these potential Wild and Scenic Rivers in the current planning process as clearly expressed in Section 5 (d) (1) of the Wild and Scenic Rivers Act. Regarding the Colorado Compact agreement, Section 13 (e) of the Wild and Scenic Rivers Act clearly states, “Nothing contained in this Act shall be construed to alter, amend, repeal, interpret, modify, or be in conflict with any interstate compact made by any States which contain any portion of the national wild and scenic rivers system.” This provides explicit assurance that any existing interstate compact would have precedence over any action taken relative to the Wild and Scenic Rivers Act. In addition, Appendix C of the Proposed RMP/Final EIS is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river.
Carbon County	Process and Procedures	Common to All and Common to all Alternatives; page 4-315: Appropriate, except, Layering management techniques are not consistent with county plans.	See GCRs 29 and 37.
Carbon County	Process and Procedures	ROS page 4-318 Layering management techniques are not consistent with county plans.	See GCRs 29 and 37.
Carbon County	Process and Procedures	Chapter 4, Recreation Decision, page 4-318: Add “When a cooperative route designation plan is completed, travel will be limited to designated routes, including all BLM and county system roads. Until then BLM and Carbon County will determine routes on a case by case basis cooperatively.”	When the ROD is signed for the RMP the route designation plan (Map 2-74) will be implemented. BLM’s route designations would apply only to BLM routes. County and State roads are shown on the map for continuity.
Carbon County	Process and Procedures	Nine mile Canyon ERMA, 4-363: The use of this description as a management plan to be used in certain areas alone, is appropriate as another tool for reaching layering management objectives, but is not acceptable to Carbon County. Layering management is not consistent with county plans. Carbon County will respond and comment on this action as though it is an individual planning action, used to designate management over a individual area, and not used consecutively with other layers of restrictions.	See GCR 37.
Carbon County	Process and Procedures	Lands and Realty; Withdrawals; p. 4-391: Some areas are appropriate for withdrawa; ACEC's are not.	Management plans for ACECs are individually created. A withdrawal is not automatically part of an ACEC but would be recommended if needed to protect the relevant and important values for which the ACEC was proposed.
Carbon County	Process and Procedures	Wind and Solar Energy Development; 4-414: Alternative D is preferred with the following caveat: With the excepting of the references to restrictions because of layering i.e. RR's ACEC's etc. that are not consistent with county plans.	BLM's decisions must be consistent with the objectives of the selected alternative across all resources and resource uses. It would be

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			inconsistent to allow wind and solar development in areas that are closed to leasing for oil and gas or in areas where visual resources are protected. Therefore, the restrictions are appropriate as stated. Also see GCR 37.
Carbon County	Process and Procedures	AREAS OF CRITICAL ENVIRONMENTAL CONCERN, page 4-485: Assumptions are incompatible with the need. The assumption is not consistent with county plans. “Manage in cooperation and in coordination with the affected counties” would create a management plan to accomplish the needed actions without layering management schemes.	See GCRs 29 and 37.
Carbon County	Process and Procedures	BLM states that these lands are not subject to the prescribed management of the ACEC, but does not give thought to the negative affect that a federal zoning layer and restriction levied on these private lands will cause. These lands are taxed and lie within a State, not a territory, On some of these lands trustees have a fiduciary responsibility given to them in the State Enabling Act. BLM is using a Congressional act, usurping power, to layer private lands and restrict any future development while making BLM's land use plan un-manageable for any agency. to accomplish. In time this layering will devalue private property, increase restrictions for our residents and cause financial loss to them. The local tax base will be reduced by attrition. Another aspect of losing the land as an economic base is the loss of a culture. It is that traditional historic pattern of man 's use of land in a unique manner that will be affected. Because of layering management, this lifestyle could be lost for all time. Since this action is agenda driven, it does not take appropriate account of or respect the interests of persons with private ownership or other legally recognized interests in land and other natural resources. It does not properly accommodate local participation in federal decision-making; or does it provide that the programs, projects, and activities are consistent with protecting public health and safety.	See GCRs 37 and 132.
Carbon County	Process and Procedures	Based on this impact analysis Carbon County finds the use ACEC 's within the boundaries of Carbon County repugnant. The method by which ACEC's are being proposed, demonstrates a violation of our resident's constitutional rights, a usurpation of State's rights and an overwrought exercise brought forth as a tool to accomplish an agenda, not related to resource protection. This plan appears to have been formulated to force out any private land or property right owners from Nine Mile Canyon and the Tavaputs Plateau.	The FLPMA, BLM Washington Office Manual 1613, and the BLM planning manual and handbook, H-1601-1, all require consideration and planning for ACECs. The objective of ACEC designations is to protect, and prevent irreparable damage to, important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or process; or to protect human life and safety from natural hazards.
Carbon County	Process and Procedures	Wild and Scenic Rivers; p. 4-552: It is our contention that there are no Wild And Scenic Rivers within the boundaries of Carbon County, or the Price Resource Area. The Act was created to be used in areas where precipitation is much larger, and the need torestrict some actions on rivers were possible without undue impact to the human environment. The act was not created to be used in the arid west.	As part of the RMP planning process BLM conducts wild and scenic river reviews for all rivers within the planning area and identifies those rivers segments that are considered eligible and then determines if those eligible segments are suitable. River segments that are included into the national wild and scenic river system are those that have either been authorized by an act of congress, or are designated by or pursuant to an act of the legislature of the State or States through which they flow. A decision regarding free-flowing is subjective in nature. There are no specific requirements

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			concerning minimum flow for an eligible segment. Flows are considered sufficient for eligibility if they sustain or complement the outstandingly remarkable values for which the segment would be designated. Rivers with intermittent flows have been designated into the national system, and rivers representative of desert ecosystems should also be considered for inclusion.
Carbon County	Recreation	Appendix 14; Evaluation Factors -- Commercial, Competitive and Organized Group SRPs: Most of the evaluation factors are not appropriate. The group sizes are not sufficient to suit groups who have been using areas for more than 50 years. The layering management is not consistent with county plans.	Appendix 14 of the Draft RMP/EIS and Appendix J of the Proposed RMP/Final EIS summarize the BLM evaluation criteria policy for issuing SRPs. Also see GCRs 29 and 81.
Carbon County	Recreation	Appendix 15; Recreation Opportunity Spectrum - Classification Standards: According to the ROS analysis, Primitive Class recreation areas require a 3-mile buffer from any roads, while Semi primitive non-motorized requires a 1-1/2 mile buffer. Based on this information, the ROS map is not accurate.	Appendix 15 of the Draft RMP/EIS and Appendix K of the Proposed RMP/Final EIS identify a 1-mile buffer for primitive class recreation. Also the ROS inventory has been updated and corrected (Map 3-17).
Carbon County	Recreation	Chapter 1, Section 1.5: The last bullet point is not reasonable since the ROS portion of the plan does not adequately portray all of the existing routes in Carbon County. Additionally, the ROS is not a planning tool it was designed to be used as a recreation management layer.	Section 1.6.2, Planning Criteria in the Proposed RMP/Final EIS have been revised and ROS has been deleted from these criteria.
Carbon County	Recreation	2.3.3 Recreation: 2-5 Add to the second bullet: without reducing other multiple uses or substituting recreation for other multiple uses.	The suggest language has not been added. Because recreation must be given full consideration in a multiple use context when making resource allocation. Recreation may be preferred over other use in specific incidents.
Carbon County	Recreation	Section 2.16; Recreation; Common to All Actions; Desolation Canyon SRMA: P.2-67-68: A plan is in place to manage the Desolation Canyon recreational activities. The RMP does not require the formulation of a SRMA to accomplish this goal. The use of the SRMA and/or ROS classification appears to violate valid and existing grazing rights, oil and gas leasing and development rights, and other certain grandfathered rights, and also the least restrictive conditions mandate of EPCA.	See GCR 107.
Carbon County	Recreation	Price Field Office Extensive Recreation Management Area (ERMA); 2-82, 83: The use of this description as a management plan to be used in certain areas alone, is Appropriate, as another tool for reaching layering management objectives, it is not acceptable to Carbon County. Layering management is not consistent with county plans.	According to the Land Use Planning Hanbook (H-1601), Appendix C any areas not delineated as a SRMA are extensive recreation management areas (ERMAs). Therefore, BLM does not have the option of not delineating these areas. See GCR 37.
Carbon County	Recreation	Section 2.16, Recreation, Special Recreation Permitting; P 2-84: Organized Group Special Recreation “Permits would be required for organized groups occupying an area for more than 2 hours, greater than 25 participants, or more than 8 vehicles outside of designated large group areas”: This requirement appears to be unworkable.	Table 2-15 of the Proposed RMP/Final EIS has been revised as related to the group size for SRPs. See GCR 81.
Carbon County	Recreation	Chapter 4, Recreation impacts to Cultural Resources, p. 4-319: ROS is skewed, making determinations from this base inappropriate.	See GCR 50.
Carbon County	Recreation	Impact Analysis, p. 418-420: All portions of the impact analysis concerning ROS are not consistent with County Plans.	See GCRs 29 and 50.
Carbon County	Recreation	Desolation Canyon SRMA, p. 4-421: A plan is already in place to manage the Desolation Canyon recreational	See GCR 107.

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		activities. This corridor does not require the formulation of a SRMA to accomplish this goal. This portion should read, “Recreation and river corridor management for the Desolation Canyon would be managed according to the provisions of the Desolation and Gray Canyons of the Green River, River Management Plan.” The affected counties in cooperation and coordination with the BLM will review and amend this plan as needed. The Counties will contribute to and be involved in the implementation of the plan.	
Carbon County	Recreation	p. 4-325: Primitive and SPNM ROS Class areas of the SRMA would be closed to OHV use, and limited to designated routes in SPM areas. The Range Creek Jeep Trail would be designated for OHV use to the present barricade. All layering is inconsistent with county plans. All existing routes will remain open for use by motorized traffic. Routine patrols will be needed to allow this. Leaving routes open will create less conflict and public disregard for federal land management. We agree that the Range Creek Jeep Trail should be designated, for OHV use to the present barricade. Until such time as the semi primitive non-motorized class is dropped from areas where existing roads and wells with valid existing rights within the logical drilling unit boundaries are located, Carbon County will maintain that this is not a logical or accurate base on which to render a decision.	See GCRs 29, 37 and 50.
Carbon County	Recreation	p.4-322;Lower Gray Canyon High-Use Area: Add to the decision; “Areas that would reflect and standards of roaded natural (RN) class areas in the ROS may contain visitor facilities, directional signage, interpretive materials, and infrastructure to support visitor health and safety, visitor appreciation of cultural resources, and resource protection. Private enterprise on private lands in support of public visitation would be encouraged by the BLM. BLM will not pursue goals that would directly compete with private entrepreneurial endeavors.”	The specific language has not been added to the decision. However, the decision in Table 2-15 of the Proposed RMP/Final EIS has been revised to emphasize facilities development.
Carbon County	Recreation	Chapter 4; Recreation impacts to Wild Horses, Burros, Fire and Fuels Management, Forest and Woodlands and Livestock; page 4-327: This chapter states no significant impact to these resource issues. Carbon County disagrees.	Sections 4.2.9, 4.2.10 and 4.3.1 of the Proposed RMP/Final EIS discuss the impacts of recreational decisions on these resources.
Carbon County	Recreation	NINE MILE CANYON, p. 4-356: Layering management is not consistent with county plans for that reason Carbon County would recommend that BLM create a unique management plan for every recreation area. This plan would be either created or reviewed and commented on in cooperation and coordination with the affected counties and appropriate state agencies. Below are our comments pertaining to such a plan. The Nine Mile area would be managed according to the 1995 Recreation and Cultural Area Management Plan except as modified by the management alternatives listed below. Such changes include; Oil and gas leasing would be areas open to leasing, subject to minor constraints determined on a case-by-case basis (timing limitations, controlled surface use, lease notices) in Nine Mile Canyon. On a caseby-case basis, determination of visual restrictions will be considered to meet the cooperative guidelines determined by BLM, Carbon County and any affected state agencies pertaining to the Nine Mile Canyon. The 2-2 map would be the closest reflection to Carbon County's position if VRM standards were used ONLY to demonstrate the desired visual conditions, and will not be used as a management tool to restrict use on public lands.	See GCRs 37 and 93.
Carbon County	Recreation	Recreation, ERMA, Decisions; Alternative D; 4-363: Carbon County would add to the analysis that any new sites developed in response to user demand, amenity value, and critical resource protection needs would be done in cooperation, coordination and consultation with the affected counties and state agencies.	Coordination is a basic premise as discussed in Section 1.5 of the Draft RMP/EIS and Section 1.7 of the Proposed RMP/Final EIS.
Carbon County	Recreation	Developed Recreation Sites: 4-368 Appropriate with added language: CLDQ, Cedar Mountain, Buckhorn Pictograph Panel, San Rafael Bridge Campground, Swasey Cabin, Little Wild Horse Canyon, Wedge Overlook, and Temple Mountain Recreation Site (proposed). Sites located in other field office areas and maintained by the PFO are Nefertiti Rapid, Butler Rapid, Stone Cabin, Swasey Beach, Swasey Boat Ramp, Mineral Bottom Boat Ramp, and Sand Wash. Existing developed recreation sites would be maintained. New sites would be developed in response to user demand, amenity value, and critical resource protection needs and in coordination and	See GCR 93.

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		cooperation with affected counties and state agencies.	
Carbon County	Recreation	Common to All Alternatives, p. 370: Carbon could support the D Alternative as the preferred, with the below amendments. If not then the No action Alternative would be preferred. BLM will cooperate and coordinate permitting with affected counties. The need for exchange of information for emergency service response, and possible county permitting requirements and added oversight into possible restriction of our historic cultural uses would demand this. When needed, BLM would develop site-specific requirements on actions in coordination with the affected counties to prevent this problem from occurring.	Coordination is a basic premise as discussed in Section 1.5 of the Draft RMP/EIS and Section 1.7 of the Proposed RMP/Final EIS.
Carbon County	Recreation	Organized Group, p. 370: Special Recreation Permits would be required for organized groups occupying an area for more than 2 hours, greater than 25 participants, or more than 8 vehicles outside of designated large group areas. Unless BLM is willing to issue permits in perpetuity to family groups, organization, religious groups, etc that have had annual meetings or get-togethers for many years in the same location, and where this practice has at present become a historic and cultural part of the community's lifestyle, then Carbon County would be adamantly opposed to this action.	See GCR 81.
Carbon County	Recreation	Recreation impacts to recreation; p 4-373: Carbon County does not believe that opportunities for primitive recreation exist within Nine Mile Canyon.	Baseline inventory indicates primitive recreation opportunities exist in Nine Mile Canyon between Franks Canyon and the Green River.
Carbon County	Recreation	Recreation Decisions; Small open areas for OHV use: Add :BLM will notify and meet with mayors and City councils when requests are received.	If the R&RP is with local communities, then BLM must coordinate with them. The suggested language is redundant.
Carbon County	Recreation	Activity plans addressing all reasonable foreseeable actions should be created uniquely, as part of each recreation site in consultation and coordination with affected state agencies and counties. Cooperative periodic review would be in order to address new or unforeseen circumstances.	See GCR 93.
Carbon County	Recreation	The ROS mapping is incorrect. BLM failed to recognize various roads on mapping. A Close look using Arc View identified roads not within the motorized area of the ROS map.	See GCR 50.
Carbon County	Recreation	Section 2.8.3, Recreation; Actions Common to All Alternatives: Modify to include consultation and coordination with state, county and local governments.	The specific language has not been added to the decision because Section 1.5 in the Draft RMP/EIS and Section 1.7 of the Proposed RMP/ Final EIS identifies coordination with other agencies as an overall commitment. Therefore, there is no need to add the requirement for consultation and coordination to all decisions in the RMP.
Carbon County	Recreation	Recreation Activity Prescriptions and Guidance; page 2-66: Appropriate with the following additions: Developed recreation sites will be recommended for withdrawal from mineral entry and either NSO or closed to mineral leasing. Developed recreation sites would be closed to grazing use. These actions will be determined on a case by case basis in consultation and cooperation with affected state agencies, and counties.	See GCR 92.
Carbon County	Recreation	Special Recreation Management Areas (SRMA); page 2-67: SRMA'S are not consistent with county plans. With the elimination of any SRMA designation, these objectives would be appropriate with the following additional language: “All SRMAs would be designated as special areas (Land and Water Conservation Fund definition) and where needed could require permits and payment of fees for recreation use.” Carbon County is opposed to layering type regulations and levying of fees for recreation use, other than voluntary drop boxes at recreation sites. •Activity plans would be reviewed or created for all SRMA as designated in the RMP. •Activity plans should be created as part of each recreation site in consultation and coordination with affected	See GCRs 29 and 93.

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		state agencies and counties. •All recreation management activities and developments in the SRMA would be in support of the individual SRMA goals and objectives. This can happen by creating individual plans as needed for each recreation site in consultation and coordination with affected state agencies and counties.	
Carbon County	Socioeconomics	The second release of the socio-economic portion of the DEIS shows that the BLM has not added any alternatives in the DEIS that would assist in adding employment, increasing income or stability for the economy or to create actions that would stabilize the ongoing use of resources on public lands. Maybe this is why a socio-economic analysis from any rural resource area in the west could be substituted for an in-depth study of our resource area.	See GCRs 2 and 132.
Carbon County	Socioeconomics	It is Carbon County's opinion that in this DEIS, the PFO has not yet achieved a reasonable range of alternatives in the Socio Economic portion or many of the other portions of the DEIS for managing our resource area.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. Measures used to analyze the impacts to the human element of the local communities, such as Emery and Carbon counties, include employment, earnings, and quality of life changes. A discussion of this analysis is provided in Section 4.6. No additional alternatives will be considered. The BLM believes the five alternatives which range from conservation management to complete development along with the No Action Alternative address a reasonable range of alternatives.
Carbon County	Socioeconomics	The most alarming issue in the DEIS to Carbon County is the fact that no reasonable impact analysis was made or reported to the public to show the possible affects to the resource area because of the proposed changes and actions. This fact alone should call for complete administrative review of this document.	See GCRs 2 and 132.
Carbon County	Socioeconomics	If the preferred alternatives in the grazing portion of the DEIS are adopted, the Price Resource Area could lose a total of 402,813.87 acres in the grazing district. This does not include other retirements, that are not added to this DEIS, and have happened over many years. Total AUM's on all of the allotments in question are not available at this time. The numbers used are based on the best information. The loss is estimated conservatively at 6,000 AUM's. As mentioned, much of the allotments were removed in 1989 when DWR, and other sports groups purchased them and subsequently turned the ownership and management over to DWR. The others are parts of ongoing trades or actions considered to remove cattle directly from the Green River. These retirements have the potential to cause a large loss in the economy of Carbon and Emery Counties. Presuming that these allotments were put into full use, the loss from calf sales alone would be approximately $400,000.00 to $500,000.00 per year if this action took place. It is possible that at least a $200,000.00 per year income loss has occurred since the original takings of the Grey Canyon WMA. The 15-year cumulative loss of approximately $3,000,00.00. The long-term impacts to the associated area businesses from the loss of income would be many times more than this, considering losses in taxes, area purchases and impacts from the agricultural infrastructure loss and the related reduction of personal assets.	Table 4-69 in Chapter 4 of the Proposed Plan/FEIS details the expected impact on grazing employment and income across all alternatives. The data in this table indicates that the Proposed Plan will provide the highest level of employment and income of all the plan alternatives.
Carbon County	Socioeconomics	Carbon County could find no area that addressed the economic impacts either positive or negative in any of the alternatives throughout this draft. Based on this, we believe that the draft fails to ensure that the economies of the	See GCRs 2 and 132.

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		resource area will not be adversely affected by the proposed actions taken through the DEIS.	
Carbon County	Socioeconomics	Carbon County feels that nowhere in the draft did the socio-economic analysis accurately address grazing use in the resource area.	See GCR 132. The socio-economics section of the Proposed RMP/Final EIS has been augmented to include an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. IMPLAN was used to predict direct, indirect, and induced employment and income effects. A discussion of this analysis is provided in Section 4.6.
Carbon County	Socioeconomics	Pertaining to the CBM production, BLM considered that an additional $49 million will be spent annually to drill and complete coalbed natural gas wells along with conventional natural gas wells within the Field Office area but failed to consider new opportunities for direct support industry jobs in the resource area, or state and local revenues generated from a variety of taxes collected by the state and local governments. BLM also failed to consider lease rentals, lease bonus payments, and royalties generated from these activities on public lands, 50 percent of which is returned to the state, which, in turn, apportions appropriate revenue to the counties.	See GCR 132. The socio-economics section of the Proposed RMP/Final EIS has been augmented to include an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. IMPLAN was used to predict direct, indirect, and induced employment and income effects. A discussion of this analysis is provided in Section 4.6.
Carbon County	Socioeconomics	The BLM fails to recognize the socioeconomic impacts associated with water development and use of water resources in the resource area.	There is absolutely no effect whatsoever on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic 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 doesn't require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would any other entity, by application through state processes. Thus, for Congressionally designated rivers, BLM may assert a federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the

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			primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. The BLM is fully evaluating and considering potential impacts related to these Wild and Scenic River decisions in this planning process. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Final EIS, and Appendix C is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river.
Carbon County	Socioeconomics	The social economic baseline profile (2003) contradicts itself and is in conflict with the Draft RMP/EIS.	See GCR 132. A new socioeconomic technical report was prepared in 2008 which augments the 2003 baseline report (Booz Allen 2008a). The new report 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect industries (trucking,lodging, etc.). This 2008 report was the basis for the preparation of Section 4.6 of the Proposed RMP/Final EIS.
Carbon County	Socioeconomics	Alternative A in Chapter 2, purports to allow the maximum amount access and development of mineral resources, including oil, gas, CBM, and coal allowed by law, with mineral resource development given primacy over other uses and resource consideration. The analysis of this increase, as presented at page 4-584,does not agree with this position.	Section 4.6.5 of the Proposed RMP/Final EIS that evaluates Alternative A socioeconomic impacts has been revised using IMPLAN. The increase in jobs is over 200.
Carbon County	Socioeconomics	The Socioeconomic section (4.12 though 4.15.4) also is inadequate in relation to the discussion of the potential impacts to the power generation industry in the area.	Sections 3.6 and 4.6 of the Proposed RMP/Final EIS include information on power generation facilities.
Carbon County	Socioeconomics	Carbon County, Emery County and the state are concerned by the apparent inaccuracies and the inadequacy of the Baseline Socioeconomic Profile, the Socio-economics section of Chapter 3, and the socioeconomic impact analysis in Chapter 4. We recommend that the baseline profile should be reviewed for inaccuracies and corrected as necessary. The	See GCR 132.

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		inconsistencies between the baseline profile and the DRMP/EIS should be reconciled, and the Socio-economics section of Chapter 4 should be revised to present a detailed analysis of social and economic consequences of implementing the various alternatives, for each community in the Price Field Office area, in such a manner that the information can be clearly understood.	
Carbon County	Socioeconomics	Chapter 4, p.4-7; The Hiawatha cogeneration plant is proposed, but does not exist. Also on page 4-7, Potential Expansion at Hunter Plant: Again BLM fails to mention the further potential jobs created in other areas by the delivery of electricity produced here. Or the approximately $I5, 000, 000.00 increase in income plus the added operations needs which can be supplied by local vendors.	The Hiawatha cogeneration plant has been removed from the discussion of existing power plants. The Draft RMP/EIS and Proposed RMP/Final EIS evaluate the socioeconomic impacts including an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties (Section 4.6). Additionally, further detail on power generation facilities has been provided.
Carbon County	Socioeconomics	Impact Analysis, page 4-421: The Cumulative Impacts to the local communities from the economic diversity and increase in potential jobs, in both direct and indirect support of CBNG productions are not addressed, and the trend should be carried over to the Impact Analysis.	See GCR 132.
Carbon County	Socioeconomics	Impact Analysis 4-426: This analysis does not address the existing historic benefit to the communities because of coal mining in our area. It doesn't state the historic and cultural connections into the lifestyle of the residents. It also doesn't address any of the cumulative impacts of the RMP decision on the industry to bring to the impact analysis.	See GCR 132.
Carbon County	Soil, Water and Riparian	Chapter 3, page 3-7 the paragraphs under section “Surface Water Quality” are confusing and misleading related to fecal coliform bacteria and cattle impacts on the Green River.	In the Proposed RMP/Final EIS this section of Chapter 3 has been written to eliminate confusion and remove incorrect information that was in the Draft RMP/EIS.
Carbon County	Soil, Water and Riparian	The DEIS detailed analysis on surface water quality disappoints Carbon County. Not to mention the fact that the DEIS clearly documents and admits that the PFO has been slowly relinquishing the economic value of grazing allotments, while in other parts of the document it states that elk numbers in this same area are increasing, it also begs the questions: Why were the cooperators not given data to support these statements? Why has this statement been released for public review without due interdisciplinary team review ? Why has the PFO singled out two unsubstantiated issues to address surface water quality throughout the area, using archaic and inconclusive science to make a decision and made statements about the loss of Cottonwood being a direct result of cattle grazing when their own documented research shows river flows, wildlife and human impact is also responsible?	See GCR 69 and 145.
Carbon County	Soil, Water and Riparian	Using the information put forth to the public in this DEIS alone, to attempt to describe an environment in order to justify an action, when reasonably, many other examples could also be given to demonstrate the surface water quality issues in the resource area, seems to indicate that the author(s) could be attempting to slant or spin the public's opinion on grazing. If that was the intent, then these are arbitrary, capricious and biased statements designed to tilt the public's opinion on grazing as a legal and accepted use of public lands. Through this tactic, it appears that this agenda has been accomplished, now that the public has reviewed the statement. It will be hard to un-ring that bell.	See GCR 69.
Carbon County	Soil, Water and Riparian	On Page 3-8, Irrigation, It states, “As a result, water during summer consists mainly of irrigation return flow that is slightly to moderately saline (BLM, 1991a). This statement is no longer totally correct. In the last 13 years since that particular BLM study, most of the agricultural users in both Carbon and Emery Counties have been using	The “Irrigation” Section of Chapter 3 in the Proposed RMP/Final EIS has been modified.

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		sprinkler systems to irrigate their lands. This practice has caused a considerable savings of water and dramatically decreased the return flows and TDML into the Price and other rivers and creeks in the resource area.	
Carbon County	Soil, Water and Riparian	Section 2.16, 2-26; Ground Water Protection of Natural Springs: Should be amended as follows: “The distance would be set based on site specific analysis and would be no greater than the least amount necessary to protect the water quality of the spring, based on geophysical, riparian, and other factors. If these factors could not be determined, a 660 foot-buffer zone would be maintained, if necessary to accomplish the desired resource protection.” Also, this action as written, would not allow for spring improvements or protection.	Table 2-2 of the Proposed RMP/Final EIS has not been changed as suggested because the concept is the same as currently written. Appendix G has been modified to allow for an exception of this restriction.
Carbon County	Soil, Water and Riparian	Section 2.16, page 2-29, Maintenance of Wetland and Riparian Areas: Alternative D should reflect the No action Alternative:” Wetlands and riparian areas would be maintained or restored.” The preferred alternative, acquiring water to maintain wetlands and riparian areas that in desert areas, where wetlands often dry up on drought years, would reduce water supplies in the long term which are needed for more critical uses.	Obtaining water rights to protect, enhance or restore the water table may be a wise or beneficial action depending on the need to maintain the water table. Riparian/wetland management developed in RMPs and activity plans should initiate management to maintain, restore, improve or expand riparian/wetlands.
Carbon County	Soil, Water and Riparian	2.16, Establishment of Buffer Zones for No Surface Disturbance Around Riparian-Wetlands Habitats, page 2-29: Appropriate with the added consideration: In keeping with BLM IM 2003-233 and 2003-234, “The distance would be set based on site specific analysis and would be no greater than the least amount necessary to protect the water quality of the spring, based on geophysical, riparian, and other factors. If these factors could not be determined, a 660 foot-buffer zone would be maintained, if necessary to accomplish the desired resource protection.” For fairness, alternative D should reflect more directly this intent.	See GCR 68.
Carbon County	Soil, Water and Riparian	Decisions, pages 4-34 to 4-45: Alternative D is preferred. Add: In keeping with BLMIM2003-233 and 2003-234, “The distance would be set based on site specific analysis and would be no greater than the least amount necessary to protect the water quality of the spring, based on geophysical, riparian, and other factors. If these factors could not be determined, a 660 foot-buffer zone would be maintained, if necessary to accomplish the desired resource protection. “ BLM would allow development of spring sources but would require protection of the spring source to maintain water quality and avoid detrimental impacts. (See BLM Manual 9000.).	See GCR 72.
Carbon County	Soil, Water and Riparian	Impacts to Soil, Water, and Riparian, p. 4-88:; Amend the word “requiring” to “encourage” in all areas applicable. It is Carbon County's position that mandatory mitigation may not be legal. Wise judgment would dictate BLM to ask rather than demand.	The mitigating measure is based on Federal authority established by the Clean Water Act of 1987, Presidential Policy and 43 CFR 4180. In order to be effective, mitigating measures must be enforceable, i.e. “required” rather thatn suffested.
Carbon County	Soil, Water and Riparian	Minerals; Conflicts of oil/gas and coal; p. 4-430; Impacts to Soil, Water and Riparian: Add to the analysis: “We don 't anticipate a greater number of acres being disturbed by this action”. The submitted plan plus the companies' willingness to mitigate any impacts would assist. Most of the analysis hasn 't addressed biological remedies or the newest range management and vegetative manipulation and rehabilitation techniques to solve many of the perceived impacts.	Section 4.2.2 impacts to soils, water, and riparian in the Proposed RMP/Final EIS has been revised related to impacts of mineral development on these resources.
Carbon County	Soil, Water and Riparian	Impacts to Soil, Water and Riparian, p 4-430: The analysis given on this topic pertaining to the increased erosion and etc. on roads is not a reasonable conclusion. Most of the roads used to develop minerals are existing routes. The companies realign them and improve them with culverts, drainage, and cattle guards, they raise the travel lanes with gravel mostly, and regularly maintain them. The older roads in the area are already contributing to the stated problem. Development companies are, by their use, mitigating the problem. There are some new roads created and pads but these are generally reclaimed when shut-in occurs, and become revegetated causing only	See GCR 72.

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		short term impacts. The pipeline corridors are the same. Within two years in burial areas vegetation is back. When reviewing a submitted plan, consider the companies willingness to mitigate any impacts. Again, this analysis has not addressed biological remedies, the newest range management and vegetative manipulation and rehabilitation techniques to solve many of the perceived impacts. This analysis needs to look into this science, to resolve conflicts.	
Carbon County	Special Status Species	2.2.7 Special Status Species: Add: " Work and cooperate with local governments, their committees, organizations and affected state agencies to promote increased habitat for threatened species to prevent listing."	Section 2.3 (Special Status Species) has been amended to include State Agencies. The others suggested changes have not been added because this section is restricted to those agencies that by law have responsibility for these species.
Carbon County	Special Status Species	Section 2.16; Special Status Species, page 2-39;Goals: Carbon want the designation of Critical habitat of federally listed Threatened, Endangered, or Candidate plant or animal species to include State of Utah Division of Wildlife Resources and County participation.	The designation of Critical Habitat for T&E species is the responsibility of the US Fish and Wildlife Service and not BLM.
Carbon County	Special Status Species	Section 2.16; Special Status Species; Actions Common to All Alternatives: add to the list; "Plans, guidelines, and protocols must not be developed or implemented without the full involvement of the County and full public disclosure. All recovery plans must provide for indicators to track the effectiveness of the plan and identify at what point recovery is accomplished.	See GCR 64.
Carbon County	Special Status Species	Section 2.16; Fish and Wildlife, page 2-40; Common to All Actions: Add: "Work with UDWR and Counties cooperatively to limit motorized travel within crucial wildlife areas to designated routes year round." Consider co-location of facilities, including utility corridors and oil and gas wells: ADD: "on a case-by-case basis in cooperation and coordination with counties, state and affected parties." Add: "In Cooperation and consultation with UDWR and Counties, minimize road densities by reclaiming redundant roads when new roads access the same general area or when it is agreed by all cooperating parties that the intended purpose for the roads has been met and they are no longer necessary." Add: "Maintain, protect, and restore riparian and wetland areas to a proper functioning condition, within capability to achieve a selection of multi-layered, obligate-dominated, vegetation community to support an optimum selection and density of wildlife species."	Table 2-8; Fish and Wildlife; Goals, Objectives, and Common to All Actions. This section of the Proposed RMP/Final EIS has been rewritten and includes the concepts but not the specific changes requested.
Carbon County	Special Status Species	Common to All Alternatives, p. 4-150: Add language: "Follow guidelines and implement management recommendations presented in species recovery or conservation plans (including but not limited to those listed below) or alternative management strategies developed in consultation with USFWS, and in consultation with affected counties."	See GCR 64.
Carbon County	Special Status Species	Chapter 4, Impacts to Special Status Species, p 4-140: The finding of a special status species will cause use restrictions in large areas. Mitigation will be required. It is Carbon County's position that any species be handled in a way that would create the opportunity to reduce the impacts of its presence on the local economy.	See GCR 7.
Carbon County	Special Status Species	Impacts to Special Status Species, p. 4-277: Add, "Managed grazing is viewed as a method to reestablish the mosaic landscape needed to support this type of obligate species. It is well documented that when cattle numbers were much higher on public land than they now are, sage grouse were much more plentiful".	The analysis assumes that the Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management would be implemented. When the guidelines are followed, BLM recognizes that grazing returns vegetation to a mosaic composition and benefits many species. However, mosaic habitat may benefit some species while

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			negatively impacting other species. Therefore, it is relevant to acknowledge that livestock grazing does alter vegetation.
Carbon County	Special Status Species	Adhere to and use the recommendations found in the UDWR Strategic Management Plan for Sage Grouse (UDWR Publication 02-2002). Additional management strategies may be incorporated when the BLM Sage-Grouse Habitat Conservation Strategy is signed. Add: “Plans, guidelines, and protocols must not be developed or implemented without the full involvement of the County and full public disclosure.” All recovery plans must provide for indicators to track the effectiveness of the plan and identify at what point recovery is accomplished.	See GCR 64.
Carbon County	Transportation and Access	Visitor Service Facilities: (Appendix 2): BLM is effectively saying only Alternative D will be used in the ROD. High Use Areas: No Alternatives or mapping will be considered, High use zones are identified on Map 2-25 in this volume the other map alternatives will be considered. Rights-of-way: In this portion, there is no mention of the BLM's acceptance or proposed actions concerning existing rights-of-way. Because access is one of the most critical aspects of any proposed designation, it affects all of the other uses associated with these lands; BLM needs to explain their position.	The Proposed Plan/Final EIS was developed after considering all of the public comment received on the Draft RMP/DEIS. The term “High Use Zones” has been changed to “Recreation Management Zones” in order to be consistent with BLM management. Applications for amendment of existing rights-of-way would be considered on a case-by-case basis.
Carbon County	Transportation and Access	Transportation and Utility ROW Corridors; pages 2-92,93: Alternative A would be the preferred Alternative, but still not acceptable to the County unless the below areas are amended to conform with county plans: • ACECs where outlined in ACEC management and necessary for protection of resource values. • Areas closed to leasing for oil and gas. Both bullets are not reasonable. We agree, where outlined in ACEC management and necessary for protection of resource values. BLM/PFO needs to identify the resource to be protected if it meets with the irreparable damage qualifier set by Congress, then designate only the amount of land needed to protect it, fence it and install signage on it. However this goal can be accomplished by individual management prescription and not by layering. •Areas classified as VRM Class I: Strike this bullet. It is not a reason to restrict Corridor establishment, especially if it is to be buried , VRM is not used to determine the use, it is used to help put the use visually into the landscape. •On or within 1 mile of sage-grouse leks: In development of new areas would include—WSAs. This bullet needs to evaluated on a case by case basis in cooperation and consultation with the county and involved state agencies. (See Map 2-51).	In its normal course of business, BLM provides public notification and notification to affected parties for all land management activities. In cases where the county is an affected party, consultation and coordination is appropriate and will take place. VRM, and ROS management classes and SRMA identification are not inconsistent with county plans. The county plans do not contain similar management and are in fact silent on these issues. The BLM under FLPMA has an obligation to manage the public lands for scenic resources and recreation [FLPMA section 102(a)(8).]. VRM, ROS and SRMA are the methods used by the BLM to manage these resources as prescribed by the BLM Planning Handbook, H-1601 and VRM Manual H-8410-1. FLPMA sec. 202(c)(9) requires consistency with State and local plans to the extent consistent with the laws governing the administration of public lands. It would be inconsistent with Federal law to remove VRM, ROS and SRMA from the RMP merely to be consistent with the silence of county plans on these issues. Use of a backcountry airstrip for commercial use would require an ROW authorization or equivalent such as being an approved, on lease facility under the Mineral Leasing Act. This is consistent with

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			FLPMA Sec. 102(a)(9) which establishes a policy of the United States receiving fair market value for the use of public lands and resources. Under the Proposed RMP, the BLM does not propose to close any of the existing backcountry airstrips. There is a statutory provision mandating BLM consultation with the FAA and State Division of Aeronautics prior to the closure of any publicly used airstrip on public land. These agencies are referenced to point out and re-enforce the statutory requirement of Public Law 106-914 sec. 345. BLM would consult with local government on airstrip closures as a matter of policy (W.O. Instruction Memorandum No. 2001-219).
Carbon County	Transportation and Access	Section 2.16; Transportation and Motorized Access; P.2-136: Add to Common to All Actions, “In coordination and cooperation with local counties” .	The coordination was added to Section 2.3.4 of the Proposed RMP/Final EIS.
Carbon County	Transportation and Access	p. 4-397: Decision Alternative A preferred. In Alternative D the inclusion of layering that is not consistent with county plans prevents us from selecting this alternative. ACEC, VRM management and the prohibitions attached to WSA 's are too restrictive, not reasonable or needed.	VRM, ACEC and WSA requirements are mandated by BLM policy and federal law. BLM strives to be consistent with county plans where possible and where consistency will not conflict with the law. See GCRs 29 and 37.
Carbon County	Transportation and Access	Lands and Realty; Corridor Decisions: page 4-398: Areas classified as VRM Class I should not be used restrict energy/utility corridor establishment, especially if lines are to be buried.	The purposed for the establishment of “corridors” is to concentrate major ROWs (i.e. pipelines, transmission lines, canals). Therefore, where scenic values are important to protect with a VRM Class I designation a major corridor would be incompatible with that objective. Hence continuing to use VRM Class I areas as avoidance areas is appropriate.
Carbon County	Transportation and Access	Land and Realty; Nine Mile Canon Pipeline ROW Decision; p. 4-407: Modify as follows: 75-ft. buffer on either side of the existing pipeline. New ROWs for aboveground structures would not be permitted on or within 1 mile of sage-grouse leks, subject to consultation with applicants, UDWR and affected counties on a case-by-case basis. ACEC 's, VRM and any other layering stipulation are not acceptable reasons to restrict Utility ROW's.	In the Proposed RMP/Final EIS the Nine Mile Canyon Pipeline ROW has been combined with the other major ROW corridors that are identified on Map 2-54. Sage grouse leks are one of the restrictions.
Carbon County	Transportation and Access	Impact from Transportation and Motorized Access: Add: “Travel for mineral resource development purposes will continue in previously permitted areas where valid existing rights to drill and explore within the WSA is present.”	Development of valid existing mineral permits and associated administrative features is allowed under FLPMA and provided for in the IMP for lands under wilderness review. Any such future development would be implemented in accordance with BLM-H-8550 Chapter III(B).
Carbon County	Transportation and Access	Common to All Alternatives 4-574; Impacts to Recreation: Reclamation of redundant road system and/or roads would reduce opportunities for motorized recreation in any areas where closures would occur. Continuing to	See GCR 21.

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		manage byway and backway corridors would maintain opportunities for motorized recreation and scenic driving on designated byways and backways in the PFO. Installation of signage throughout the field office would alter the recreation experience by providing information and directing users. Continued use of backcountry airstrips in the PFO would maintain unique opportunities for recreational backcountry aviation. Any closure of these backcountry airstrips would result in a loss of a regionally unique recreation opportunity. The comments relating to management or maintaining roads, signage installation, and the continued use of the back country airstrips is consistent with Carbon County plans. The Caveat is that all of these actions are accomplished in cooperation, consultation and in coordination with the affected Counties.	
Carbon County	Transportation and Access	Impacts to Transportation and Motorized Access; p. 4-574: Establishing and implementing maintenance agreements with the counties to maintain system roads and requiring reclamation of redundant road systems and/or roads that no longer serve their intended purpose would yield long-term, direct benefits for transportation and motorized access by reducing required road maintenance and associated costs. As this action is performed in cooperation and with consultation with the affected counties it will be consistent with county plans. Directional, informational, regulatory, and interpretive signage at appropriate locations throughout the PFO would improve visitor safety. As this action is performed in cooperation and with consultation with the affected counties it will be consistent with county plans.	See GCRs 15, 29 and 39.
Carbon County	Transportation and Access	p. 4-574: The following document is Carbon County's Transportations Master Plan, it is expected that the BLM will be consistent with this document when both BLM and Carbon County create the route designation plan for Carbon County: (SEE HARDCOPY OF LETTER FOR CARBON COUNTY'S TRANSPORTATION MASTER PLAN).	See GCRs 29 and 39.
Carbon County	Transportation and Access	Carbon County views access as the most important issue in the development of a land use plan. Access sets the stage for the ability to develop, recreate, or achieve any action. We will work in conjunction with and support the BLM in their goals as long as the agency attains the needed consistency with our goals and objectives. The cumulative impacts of this action will be the reduction of conflicts and the creation of the efficiency in implementation needed to protect and yet utilize the resources within the resource area.	BLM is required by NEPA, FLPMA and other laws and regulations to coordinate on the management of public lands within the Price Field Office with other land management agencies, counties, municipalities, and private entities. Regional partnerships and cooperative efforts are welcomed by BLM.
Carbon County	Transportation and Access	Recreation; p. 4-322: Impacts to Range Creek ACEC: Established, existing rights-of-way shall stay open to public use by motorized vehicles.	The discussion here is related to recreational OHV use, for which BLM has discretion of which routes are designated. Existing ROWs will remain for the purposes for which they were issued. In some cases public access to a ROW may not be allowed.
Carbon County	Vegetation	2.2.3 Goals and Objectives of Vegetation: To comply with the Taylor Grazing Act a statement needs to be added related to the Rangeland Health Standards.	A goal has been added to Table 2-3 (vegetation) related to the Standards for Rangeland Health and Guidelines for Grazing Management.
Carbon County	Vegetation	Section 2.16 (Vegetation) pages 30, Common to All, Off-Site Mitigation: Modify to include: “BLM recognizes the merit of off-site mitigation strategies for the purposes of habitat enhancement. BLM would encourage willing partners to participate in off-site mitigation strategies.”	The “Common to All” Table 2-3 of the Proposed RMP/Final EIS has been modified to include this concept.
Carbon County	Vegetation	Chapter 4 Wetland Vegetation Decisions: page 4-77: This is a reasonable action, but only in some years, forage needs to be grazed off periodically. A rotation system in such areas will accomplish the needed goal analyzed in this section.	The decision does not preclude grazing, but rather, provides specific guidelines for riparian/wetland management. Avoiding grazing in meadow, marsh,

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			and riparian areas in the spring reduces the potential for damage to these areas from surface disturbance during the wet season. Grazing could occur every year as long as adequate herbaceous cover is maintained to reduce the potential for erosion and subsequent sediment loading into water bodies.
Carbon County	Vegetation	Chapter 4, Fish and Wildlife impact to Vegetation, p. 166: Prohibiting domestic sheep from grazing allotments in a 9-mile buffer surrounding occupied bighorn sheep habitat increases the percent cover of forbs in those areas and changes the vegetation structure. This sentence changes the use of allotments from cattle to sheep.	The RMP determines what kinds of livestock and wildlife will be provided for and at what level as long as the rangeland health is maintained.
Carbon County	Vegetation	ACEC designation impacts to vegetation 4-517: How can the PFO determine that not designating an additional ACEC impacts vegetation by reducing the area of relict vegetation available for monitoring and research? Since designation of the existing ACEC, no impact analysis has been done, to demonstrate this statement. The cumulative impacts to the human environment, the rural communities, or the nation were never considered.	Alternative A of the Proposed RMP/Final EIS includes the decision to not manage Big Flat Tops and Bowknot Bend as ACECs which are managed for the relevant and important value of relict vegetation. Under this Alternative, the acres designated as an ACEC to protect or manage relict vegetation would be reduced.
Carbon County	Visual Resources	Appendix 6; Visual Resource Management: This practice is not consistent with county plans or objectives. The practice of inventorying and evaluation of lands for the purpose of giving visual ratings or management classes, which will determine the amount of modification allowed to the basic elements of the landscape is not consistent with county plans.	Management of visual resources is part of the BLM's multiple use mandate. Appendix 6 of the Draft RMP/EIS defined objectives of each class. The application of those classes to public lands is identified in Chapter 2 of the Draft RMP/EIS. See GCR 29.
Carbon County	Visual Resources	Section 2.16, Visual Resources: page 2-38; Goals: Reword as follows: • Manage public lands in a manner that protects the quality of scenic (visual) resource values without negatively impacting domestic livestock grazing…"mineral exploration and production…timber production or other principal and major uses of the land. • Recognize and manage visual resources for overall multiple use and quality of life for local communities who enjoy the land and who rely on balanced, sustained-yield economic use of natural resources in the planning area, and visitors to public lands. • Manage BLM actions necessary to protect against permanent and irreparable damage to those scenic vistas that are deemed most important.	The goals for Visual Resources contained in Table 2-6 of the Proposed RMP/Final EIS have not be rewritten as suggested because the suggested changes would not enhance the meaning of the goals.
Carbon County	Visual Resources	Section 2.16; Visual Resources; Actions Common to All Alternatives: Carbon County opposes the use of VRM as a management tool and believes other tools can resolve the concerns.	The BLM is required to be consistent with county plans where possible. However, BLM cannot choose to ignore visual resources in the RMP. Management of visual resources is part of BLM's multiple use mandate, and BLM is required to establish objectives for management of those values in land use planning.
Carbon County	Visual Resources	If BLM will not follow Carbon County plans, the following is the least onerous: Alternative A: Manage the following acreages, as indicated on Map 2-2, for the objectives defined for each VRM class (see Appendix 6): Class I: 668,049.	See GCR 137.
Carbon County	Visual Resources	Chapter 4, Visual Resources impacts Leasable Minerals, p. 4-135; Oil and Gas: The use of this management	See GCR 139.

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		scenario has reduced the uses of land with prior valid existing rights. The WSA was formed over existing logical drilling units.	
Carbon County	Visual Resources	Decision Background, p. 4-136: Scenic resources are an important component of landscapes within the PFO. Scenic resources are highly valued by visitors to the area, as well as by local communities. Visual resources are assigned one of four management classes (I through IV). Each class provides management actions and structural developments with an allowable degree of visual contrast. The more restrictive VRM classes (I and II) may preclude some types of development or require mitigation actions. Carbon County sees VRM, or any layering management tool as a lazy way to set an unattainable goal. Even if all of the conditions are met and every law and regulation is followed local management layers can restrict the progress of or stop a potential development. An objective impact analysis would show that layering management scenarios will cause long-term negative impacts to an already over priced market for energy. This action is in opposition to the stability, good order, and security of the nation.	See GCR 37.
Carbon County	Visual Resources	Should visual impacts be a part of a management plan to allow use in an area and create a circumstance that would make the development less observable, but not restrict its development or use, as is done in county planning activities; then Carbon County would select the mapping with the most reasonable and allowable uses, which would be Map 2-2 as depicted in Alternative A.	When BLM sets visual resource management objectives through a planning decision, it must ensure that objectives are met or that plans are amended to allow activities that would not meet the objectives. Plan amendments can be done to amend VRM objectives to allow other activities that maybe in the public interests.
Carbon County	Visual Resources	Impacts to Visual Resources, p. 4-277: Many people like to see cattle on the land. Part of the reason that many people vacation in the west is to see the range, with cattle and cowboys. The American people are proud of their heritage. The public land cattle industry is part of that heritage. Range Improvements are part of that landscape. The standards and guidelines also mitigate visual impacts because of the stubble and other health monitoring requirements. The wildlife areas unfortunately are not kept up as such, and apparently BLM will not address an impact analysis with the same standards for wildlife as they require for grazing and some levels of recreation or mineral development.	The impact described in Section 4.2.6 expresses the fact that the visual characteristics of the landscape would change. It does not attempt to make a value judgment of those impacts.
Carbon County	Visual Resources	Development would be required to meet standards more closely aligned with VRM III and IV restrictions. (See Map 2-2.) Alternative A in the mapping should be the preferred Alternative. When a cooperative route designation plan is done, travel will be limited to designated routes, including all BLM and county system roads. Until then BLM and Carbon County will determine routes on a case-by-case basis, cooperatively. Areas that reflect standards of roaded natural (RN), using the ROS, may contain visitor facilities, directional signage, interpretive materials, and infrastructure to support visitor health and safety, visitor appreciation of cultural resources, and resource protection. Private enterprise on private lands in support of public visitation would be encouraged by the BLM. BLM will not pursue any goals that would directly compete with private entrepreneurial endeavors.	See GCR 135.
Carbon County	Visual Resources	WSAs should not be managed as VRM Class I areas because must comply with IMP.	The prescribed management objective for visual resources in WSAs is to manage it as VRM Class I in accordance with IM 2000-096. See GCR 115.
Carbon County	Wild and Scenic Rivers	Appendix 3; Wild and Scenic Rivers Study Process; Carbon County opposes any attempt to designate Wild and Scenic Rivers on any stream creek or river segment in the resource area. Further, we believe that Congressional approval is necessary before a stream can be designated suitable.	Neither the Wild and Scenic Rivers Act, BLM regulations, nor any other policy require the BLM to receive Congressional consent prior to making a determination on the suitability of a stream for designation under the Wild and Scenic Rivers Act.
Carbon County	Wild and Scenic Rivers	Appendix 22; Classification Criteria for Wild and Scenic Rivers; There is no mention of the suitability criteria.	See GCR 25.

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Carbon County	Wild and Scenic Rivers	1.6.16 Wild and Scenic Rivers: Responding to first statement: The Price River MFP did not make wild and scenic river considerations. This is not true! Pages 12 and 13 of the 1984 Price River MFP states as follows: Wild and Scenic Rivers Study Areas: "The National Rivers inventory identified portions of the Price and Green Rivers, and Range Creek as potential additions to the National Wild and Scenic Rivers System. Thirty miles of the Green River within Desolation and Gray Canyons, approximately 16 miles of the; Price River, and approximately five miles of Range Creek are affected by the proposed action. USDI/USDA Guidelines for interim management state that authorized uses shall not be allowed to adversely affect either eligibility or prospective classification, subject to valid existing rights."	The Price River Management Framework Plan (MFP) evaluates and considers any adverse impacts that could result to rivers listed in the Nationwide Rivers Inventory (NRI), a list of potentially eligible streams identified and maintained by the National Park Service. This was done in compliance with a 1979 Presidential directive, and related Council on Environmental Quality procedures requirement that all federal agencies must seek to avoid or mitigate actions that would adversely affect one or more NRI segments. The NRI is a source of information for agency river assessments and federal agencies involved with stream-related projects. The Price River MFP did not, however, evaluate rivers for their eligibility and suitability under the Wild and Scenic Rivers Act.
Carbon County	Wild and Scenic Rivers	Section 2.16; Wild and Scenic Rivers: page 2-131: Carbon County does not agree that Congress has not given BLM authority to manage those rivers found to be suitable to any other degree until designation is given. Alternative C provides for designation of all eligible rivers in the DEIS, but not all of the eligible rivers have an alternative that provides for no designation in any alternative.	Rivers found suitable through agency planning processes must, to the extent of BLM's authority, protect the values which contribute to the stream's original eligibility. The BLM is obligated to attempt to avoid or otherwise mitigate any adverse affects to these values in the interim until Congress has an opportunity to act on potential designations. In addition, Alternative A of the Proposed RMP/Final EIS has been changed to provide for no designation of any stream into the national system of Wild and Scenic Rivers.
Carbon County	Wild and Scenic Rivers	Wild and Scenic River designation is not an appropriate action and not consistent with county plans.	Because resource management planning consists of allowing for multiple use, layering of management is unavoidable. Wild and Scenic River determinations are required in agency planning. Section 5(d)(1) of the Wild and Scenic Rivers Act of 1968 directs federal agencies to consider the potential for national wild, scenic and recreational river areas in all planning for the use and development of water and related land resources. Agencies must conduct Wild and Scenic River reviews as part of their land management planning process. Within the RMP, BLM only makes a determination if river segments are eligible and suitable; the designation of a river segment as Wild and Scenic requires an act of Congress. Also see

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			GCRs 29 and 37.
Carbon County	Wild and Scenic Rivers	Old Spanish Trail (Public Law 107-325) page 4-113; Decision Background; Decision: Alternative D preferred, provided that Impacts to Wild and Scenic Rivers are removed from this analysis on the Old Spanish Trail. W&SR 's are not consistent with county plans.	See GCRs 29 and 150.
Carbon County	Wild and Scenic Rivers	4-192; Alternative A: preferred with the exception of Wild & Scenic Rivers as below: Wild and Scenic Rivers designation is not consistent with County or State Plans.	The BLM is mandated by Congress through the provisions of Section 5 (d) (1) of the Wild and Scenic Rivers Act to considered streams with potential for inclusion into the national system of rivers in all resource management planning processes. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Final EIS, and Appendix C identifies the concerns and lack of support of the counties. Also see GCR 29.
Carbon County	Wild and Scenic Rivers	Special Designations and Support: page 4-330: We agree with NSI on these issues and would add that Carbon County is opposed to W&SR's and do not support designation. We are also opposed to WSR management of any segment of any creek, river or stream in the resource area until and unless any are designated. In this comment we are stating directly that by doing so, BLM, in our opinion, by your own, will usurp powers of congress, powers and authority that were never granted to the Department of the Interior.	Rivers found suitable through agency planning processes such as this are not afforded protection under the Wild and Scenic Rivers Act (Act) from proposed hydroelectric facilities or other federally assisted water resource projects that have the potential to affect the river's free-flowing characteristics and other identified values prior to Congressional designation of the stream into the national system of Wild and Scenic Rivers. However, it is BLM's national policy (Handbook 8351) to protect the values which contribute to the stream's eligibility. Through all case-by-case environment impact analysis per the National Environmental Policy Act (NEPA), the BLM is obligated to attempt to avoid or otherwise mitigate any adverse affects to these values in the interim until Congress has an opportunity to act on potential designations. In addition, the Federal Land Policy and Management Act (FLPMA) provides BLM with broad authority to manage the public lands including eligible/suitable river segments. Because Section 5(d)(1) of the Wild and Scenic Rivers Act requires that rivers be considered for wild and scenic purposes in planning, and because NEPA (40 CFR 1506.1) restricts actions that would limit the selection of alternatives, it is appropriate that BLM manage eligible/suitable rivers in a protective manner to protect values for possible Congressional

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			designation. For an additional discussion of interim management of eligible streams, see GCRs 26 and 28.
Carbon County	Wild and Scenic Rivers	WILD AND SCENIC RIVERS 4-552 Assumptions: Add: Any found to be unsuitable or not appropriate to designate through local, state and congressional review, would be dropped.	This language has been added to Table 2-20 of the Proposed RMP/Final EIS.
Carbon County	Wild and Scenic Rivers	Wild and Scenic Rivers; Carbon County does not accept any Wild and Scenic Rivers in Carbon County.	See GCR 150.
Carbon County	Wild and Scenic Rivers	Transportation and Access impacts to Wild and Scenic Rivers; 9 4-574: Actions pertaining to the impacts would be subject to review by Carbon County in cooperation and consultation with BLM, not just, on the W&SR impacts, but in any area where any limits or restrictions to access is proposed to occur.	Section 1.7 and Table 2-22 Transportation and motorized access, Common to All Alternatives, of the Proposed RMP/Final EIS imply that all decisions require coordination with the Counties.
Carbon County	Wild Horses and Burros	Chapter 1, 1.6.6 Wild Horses and Burros: Add to the statement: Four Herd Management Areas (HMA) exist in the planning area (Range Creek, Muddy Creek, Sinbad, and Robber's Roost). This RMP addresses the management of wild horses, including initial and estimated herd sizes, while preserving or maintaining a thriving ecological balance and continuing multiple use relationships without undue impact to other resource users and grazing preference. Actions will be to.	See GCR 96.
Carbon County	Wild Horses and Burros	Chapter 4, Soil, Water, and Riparian Decision Impacts to Wild Horses and Burros, page 4-57: What is the impact to Soil, Water, and riparian by the wild horses?	Section 4.2.2 of the Proposed RMP/Final EIS analyzes the impacts of Wild Horses to Soils, Water and Riparian.
Carbon County	Wild Horses and Burros	Chapter 4, Wild Horse and Burros; Forage Allocation, 4-214 : Alternative D should be modified to include "…would not occur at the expense of domestic livestock grazing".	See GCR 96.
Carbon County	Wild Horses and Burros	Section 2.7.9, Wild Horse and Burros, Actions Common to All Alternatives: Add the following bullets:"•Horse Management Plans must include provisions for periodic gathering of all horses in the unit to limit populations to planned levels, to remove trespass horses and to test far equine diseases as prescribed by the Utah State veterinarian, and adopted County plans. •Wild Horses assigned to herd units must be identified in such a way as to insure that feral or fugitive horses are not assimilated into wild horse herds on public lands. •Remove natural and legal barriers which prohibit the construction and maintenance of watering facilities, springs, seeps or ponds, which benefit other wildlife".	Language was not added because:43 CFR 4700 provides guidanceon removal of wild horses and stray domestic stock, health and identification, maintenance, destruction, use of air craft, etc…During planned gathers all horses are inspected by the local brand inspector for brands and then each animal that is removed is tested for equine diseases and vaccinated. If a domestic horse is not marked in any way, unless it does not conform to the size and characteristics of the herd it may or not be easily identified as an introduced horse. Construction and maintenance of watering facilities are implementation decisions that are beyond the scope of the RMP.
Carbon County	Wild Horses and Burros	Prefer Range Creek HMA Alternative D as amended: 75-125 horses with 100 horses being the target number. Gathering needed at numbers beyond the target. Explanation: to allow no more than 100 wild horses, and zero (0) burros is consistent with Carbon County's plans.	An AML is a population range between which a wild horse or burro herd will be managed. For the Range Creek HMA, any number of wild horses between 75 and 125 is considered appropriate and thus will not warrant population reductions under normal conditions. Maintaining this range also allows for a 3-4 year gather cycle, reducing wild horse numbers to 75 and allowing them to reproduce naturally for 3-4 year until they reach a

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			population of 125, then removing excess wild horses. This is necessary to maintain a thriving natural ecological balance on the public lands in the HMA while maintaining a genetically viable population of wild horses.
Carbon County	Wild Horses and Burros	Page 2-48: Alternative D should be amended to comply with Congressional intent._ When monitoring data and best science identify an increase in available forage in HMA's which are within Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUM's to levels historically designated when the grazing district was established, then any excess available forage will be reasonably allocated between horses/burros and wildlife. For increases in available forage in HMA's which are not in grazing districts, allocations would be adjusted proportionately among wild horses/burros, wildlife and any permitted livestock use in the area. When monitoring data and best science identify a decrease in available forage in HMA's which are in Taylor Grazing Act grazing districts, such decrease will first be allocated between wild horses/burros and wildlife in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decreases in available forage in HMA's which are not in grazing districts, allocations would be adjusted proportionately between wild horses/burros, wildlife, and any permitted livestock use in the area.	See GCR 96.
Carbon County	Wilderness	1.6.14, Non-WSA Lands With or Likely to Have Wilderness Characteristics: Under the terms of the Settlement agreement in Utah v. Norton, Utah BLM may identify those lands where wilderness characteristics as well as other multiple uses and resources exist. But in the DEIS, BLM may only consider wilderness characteristics in a manner equal to those of other resource information.	See GCR 108.
Carbon County	Wilderness	Assumptions, the following assumptions regarding construction : Average initial and long-term disturbance for ancillary facilities (e.g., compressors, power lines) per facility 20.0 acres in the Tavaputs Plateau, an area with high potential for the occurrence of energy resources, oil and gas exploration and development and OHV travel would affect wilderness characteristics. In the remainder of the PFO, an area with low potential for the occurrence of energy resources, only OHV travel would affect wilderness characteristics. Throughout the PFO, management of SRMAs and ACECs would affect the wilderness characteristics of portions of the WSAs. If the SKIM 's and ACEC 's were managed according to a site by site management plan, and not layers, many conflicts would be mitigated. OHV use on Carbon County ROW's will be determined by the County Commission.	Most designations identified in Chapter 2 have decisions to prepare site specific management plans as the commenter suggests. Site-specific issues will be resolved in site-specific management plans.
Carbon County	Wilderness	Decision Background, p. 4-473: Decisions considered common to all alternatives are easily lumped into two categories: decisions that address management of wilderness characteristics within WSAs under the IMP; and decisions that address management of WSAs if released from wilderness consideration. The decisions concerning interim management (IMP) of WSAs are included to emphasize and clarify existing policy. For the other decision, Appendix C of the BLM Planning Handbook (BLM-H-1601) directs BLM to identify in RMPs a management direction for WSAs should they be released from wilderness consideration by Congress and therefore are no longer subject to management under the IMP. Management for any WSA's released from wilderness consideration by Congress should have been a topic of consideration and conversation during the interdisciplinary meetings. The future uses of these areas are of great importance to the counties and the state.	See GCR 112.
Carbon County	Wilderness	WSA Decision, p. 4-473: Add: Motorized travel in areas of Jacks Canyon for mineral development of valid existing mineral permits will be allowed.	Language was not added because the BLM recognizes valid existing rights for mineral development. See Section 1.5 in the Draft RMP/EIS and Section 1.6 of the Proposed RMP/Final EIS. Also see GCR 110.
Carbon County	Wilderness	Common to all Alternatives: page 4-474. 3, Impact Analysis: WSAs are managed according to the IMP, which is	See GCR 112.

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		current policy for these areas. This analysis does not analyze the impact of interim management (IMP) on other resources and resource uses. That analysis was conducted in the Utah Statewide Wilderness FEIS. If the WSAs are released, impacts to other resources and resource uses would not be expected to be significantly different from the impacts identified in this analysis. If Congress releases the WSAs, the impacts from management of wilderness characteristics would be contained within the management prescriptions for all other resources as described in text, tables, and maps under the selected alternative. Any attempt to manage lands released from WSA 's for wilderness characteristics is not in accordance with the wilderness settlement.	
Carbon County	Wilderness	Management of WSAs if Released by Congress: page 4-475, Decisions : SRMA or any other management layering is not consistent with county plans.	See GCRs 29, 37 and 112.
Carbon County	Wilderness	p.4-475: Should Congress release the following WSAs from management under the IMP, they would be managed as part of the San Rafael SRMA as described in the alternatives that follow: Crack Canyon, Devil's Canyon, Link's Flat ISA, Mexican Mountain, Muddy Creek, San Rafael River, Sid's Mountain, and Sid's Cabin. Any alternative direction taken on this issue, after the WSA is released, should be from a plan created in cooperation, coordination and consultation with the affected County.	See GCR 112.
Carbon County	Wilderness	Non-WSA Lands with Wilderness Characteristics, page 4-480: The county does not think that the BLM has authority to consider protection of these lands under the Utah v. Norton settlement agreement.	The BLM addresses its authority to development management prescription for Non-WSA lands with Wilderness Characteristics in the Supplement to the draft released in Sept 2007 which detailed an Alternative E. Also see GCR 146.
Carbon County	Wilderness	Transportation and Motorized Access, Impacts to Wilderness Study Areas, page 4-574, No significant impact: Any action to do with access will have a definite affect on the ability to use the land.	Because WSAs would be managed according to BLM's Wilderness IMP (H-8550-1) Transportation and Access decisions were determined to not result in impacts to WSAs when other RMP decisions and BLM policies are implemented.
Carbon County	Wildlife and Fish	Appendix 7; Best Management Practices for Raptors: The requirement that all activities must be at least 1/2 mile away, with no allowance for variation, would have made it impossible for Conoco/Phillips to develop at least 25% of their existing wells. This is also true in other areas. There should be an allowance for variation, based on a case-by-case analysis.	The proposed RMP/Final EIS, Appendix F (raptor guidelines) has been updated given the latest guidance from US Fish and Wildlife Service, Utah Division of Wildlife Resources, and BLM and includes variances.
Carbon County	Wildlife and Fish	Appendix 8; Wildlife Stipulations: Carbon county has numerous concerns about the restrictions and the confusion in this Appendix.	See GCR 41.
Carbon County	Wildlife and Fish	Appendix 8: Mandatory dates of disturbance should not apply to certain administrative needs or improvements, such as pond cleaning or building. Management practices sometimes need to be accomplished during times when they can be done in an efficient manner.	See GCR 42.
Carbon County	Wildlife and Fish	Appendix 8: We support the elimination of mandatory 1:1 acre-for-acre off-site mitigation for any action that would result in surface disturbance to crucial value habitats. This statement is inconsistent with Appendix 8, in the Spatial and Seasonal Wildlife Conservation Measure area, where it is stated that, “off-site mitigation is required for mule deer/elk crucial winter habitat and Rocky Mountain and Desert bighorn sheep.”	See GCR 41.
Carbon County	Wildlife and Fish	Appendix 16, Page 116, 121, To all surface disturbing activities, Seasonal Closures: This Appendix mandates seasonal closures for both Critical Range and High Value Range. In the manual it only mentions the Critical Range. Adding High Value Range to this matrix makes the standards too restrictive. The guidelines don't leave room for exceptions. Administrative or other issues might occur that require that issues be addressed separately. The Appendix doesn't give habitat managers the leeway to grant variances or waivers in cases such as if no	See GCR 41.

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		animals are found in the area etc. Local habitat managers need more flexibility in the exception category.	
Carbon County	Wildlife and Fish	Section 2.16; Fish and Wildlife, page 2-39; Goals, Actions Common to All: Add: " Maintain, protect, and enhance fish and wildlife habitats to support a natural selection of healthy, self-sustaining density of wildlife and fish species. • Maintain, restore, protect, and enhance important habitats, recognizing crucial and high-value habitats as management priorities. • Recognize and support the role of the Utah Division of Wildlife Resources (UDWR) in managing wildlife and fisheries populations and in regulating hunting and fishing. • Recognize and support the role of the USFWS in managing migratory…".	The Common to All Actions contained in Table 2-8 of the Proposed RMP/Final EIS have been revised. The specific additions suggested in the comment have not been made as new bullets; however, the concepts of the bullets are now included.
Carbon County	Wildlife and Fish	Actions common to all Alternatives: P. 2-39: Add: "Wildlife numbers will remain at the allocated level until studies and analysis are completed to determine the ability of forage resources to support the increase and species population trends. No increases in wildlife numbers or the introduction of additional species may be made until the increase in forage or habitat has been provided for. The impacts to other wildlife species will be assessed prior to managing for increases or introduction. For example: It has been theorized that elk numbers in our region are extreme, exceed historical populations, and are affecting the deer population. Reduction in forage allocation resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife as well as livestock. Wildlife target levels and/or populations must not exceed the forage assigned to wildlife in the RMP forage allocations. In evaluating a proposed introduction of wildlife species, priority will be given to species that will provide for increased recreational activities. Predator and wildlife numbers must be controlled to a level that protects livestock and other private property from loss or damage and to prevent decline in populations of other wildlife species. Through wildlife habitat mitigation banking, impacts of development can be mitigated in a more efficient and planned manner." When implemented, this system could provide much-needed habitat for wildlife and livestock alike, while providing for multiple use.	See GCR 8.
Carbon County	Wildlife and Fish	Predator Control, Page 2-40: Alternative B preferred. Predator control action will be implemented by allotment area through proper revisions to the MOU with APHIS to target species-specific needs for livestock grazing.	See GCR 47.
Carbon County	Wildlife and Fish	Section 2.16, Fish and Wildlife; P.2-40, Identify Actions and Area wide Use Restrictions to Achieve Desired Fish and Wildlife Populations and Habitat Conditions: Modify to read "Recognize and coordinate with valid existing rights and holders of grazing preferences, Big game winter range would be managed to maximize browse production, using class of livestock and season of use (Same as No Action Alternative)."	Table 2-8 of the Proposed RMP/Final EIS has not been modified to include the suggest change because BLM must coordinate with grazing lessees in making changes to grazing permits.
Carbon County	Wildlife and Fish	Section 2.16; Fish and Wildlife;Forage Allocation, page 2-42: Add the concept that any additional forage must first restore livestock to historically levels then the remainder can be allocated to other uses. Management of Migratory Bird Habitats: pages 2-43, 44: Add "recognizing prior exiting rights and grazing preference". Prairie Dog Habitat: P.2-45: Add; "Recognizing prior existing rights and grazing preference", Habitat Manipulation for Fish Population Maintenance, Recovery, and Enhancement, P.2-45: Add "recognizing prior existing rights".	The forage language was not added because forage is not considered to be additional until the existing livestock grazing permits are restored to their permitted levels. "Recognize prior existing rights" was not added to each of the decisions because BLM recognizes valid existing rights. See GCR 110.
Carbon County	Wildlife and Fish	p. 164, Decision Alternative D: Preferred, provided it is changed as below: "Big game winter range would be managed to maximize browse production, using class of livestock and season of use. If the area is a grazing allotment, the preference use is acknowledged and the AMP will be amended as such, only in consultation and coordination with the grazing permittee". In this issue the benefits need to be also in favor of the permit holder.	Historical levels of AUMs established at the time of TGA may not be possible to attain in some areas due to the intervening years of management or natural succession events that have permanently

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			changed plant communities. Additionally, passage of laws and changes in regulation or policy require consideration of other resources in addition to livestock grazing. TGA contains fundamental protection and conservation under the principles of multiple use and sustained productivity. In accordance with 43 CFR 4110.3: "The authorized officer shall periodically review the permitted use specified in a grazing permit and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer." Increases or decreases in permitted use will be proportioned among users in accordance with their contribution, stewardship or monitoring data identifying those who are responsible for the increase or decrease in productivity.
Carbon County	Wildlife and Fish	Chapter 4, Fish and wildlife impacts to Soil, Water and Riparian; p 4-164: Change analysis to "Changes in grazing practices to improve forage availability would provide long-term benefits in preserving soil, water, and riparian resources. Habitat and stream restoration projects would have short-term impacts to soil, water, and riparian/wetland resources. These short-term impacts could include displacement of vegetation associated with the riparian resources and increased siltation and sediment loading from reshaping and preparing stream banks for placement of instream structures. There may be impacts from equipment used in stream restoration projects. However, there would be long-term benefits to stream geomorphology by slowing rapidly moving water, improving the function of riparian/wetland complexes, reducing soil and stream bank erosion, reducing water depletions, and increasing filtration of silt and nutrients. Protecting wildlife habitats through the use of seasonal closures for surface-disturbing activities could provide long-term benefits in preserving soil, water, and riparian resources. Protecting soil, water, and riparian resources during periods when they are most fragile would prevent the breakdown of soils that would lead to erosion, siltation, and sedimentation. This would enhance the habitat to the benefit of both wildlife and livestock. The cumulative impact of this statement is that it now recognizes the grazing preference as intended, to provide Congressional intent back into the land use planning document. This will allow continued long-term recognition of grazing and its Congressionally mandated right."	The TGA does not specifically state that in grazing allotments livestock have preference for use of forage. The suggested wording has not been incorporated into the Proposed RMP/Final EIS because the changes would not logically relate to the stated intent for the changes.
Carbon County	Wildlife and Fish	Identify Actions and Area-wide Use Restrictions to Achieve Desired Fish and Wildlife Population and Habitat Conditions, p. 171: General Statement: BLM has, in this area almost completely dismantled the TGA, overlooked CFR 4100 and its mandates to grazing preference, and compensatory use. BLM is also not looking at statements within the Supreme court documents that assured grazers that even though the Secretary could take areas out of grazing in the land use planning process that it provided the right to protest this action if reasonable scientific data is not provided to support the decision; "if it can be grazed, it must be grazed". The purpose of this chapter is to analyze and disclose potential significant impact of the "federal action" on the "human environment." BLM has done just that in exposing its intent to take valid grazing use and convert it to other uses. The impact of this action	Historical livestock grazing use does not preclude other uses of the public lands; nor do other uses always preclude livestock grazing. Passage of laws and changes in regulation or policy, as well as the application of scientific data, has been utilized during this RMP process to analyze the impacts of different resource uses appropriate for multiple-use management of public lands in the Price Field

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		is the total decimation of the public lands livestock industry. The cumulative impact is the loss of the historic cultural lifestyle that has contributed to the building and settling of the west. Existing for over 150 years, this recently maligned but honorable industry has become a legend in this great nation, and around the world. As the cattle and sheep industries do all of this, they also provide healthy affordable food by conversion of a natural renewable resource for the benefit and security of the American people.	Office. BLM recognizes the impact public lands have on the livelihood and economy of local communities. Under all RMP alternatives BLM would continue to work closely with local communities to consider the needs of the parties involved as directed by law, regulation, and policy. Also see GCR 132.
Carbon County	Wildlife and Fish	Chapter 4, Fish and Wildlife; Grazing Management in Pronghorn Ranges, page 4-172: Edit to read, “Current Pronghorn populations in cattle grazing ranges reduce the availability of the forage necessary to sustain the preferenced use.”	The referenced grazing statement says that forb production on antelope ranges can be improved by altering the season of use by cattle. It would be a management option, not a directive. Antelope are a native species and were present historically.
Carbon County	Wildlife and Fish	Chapter 2, p 4: Change Pronghorn Antelope to read, “Current livestock grazing prescriptions would continue. In consultation and coordination with the permittee, BLM will continue to find opportunities to continue to enhance forb production for pronghorn.”	The suggested language has not been added to Table 2-8 of the Proposed RMP/Final EIS because under current regulations applicable to all alternatives any adjustments in grazing prescriptions must be coordinated with the permittee.
Carbon County	Wildlife and Fish	Introduction, Transplantation, Augmentation, and Reestablishment of Fish and Wildlife Species, page 4-200, Decision Background, Decisions: Acceptable with additional language: “When planning activities consider turn out, augmentation or establishment of native or non-native species in Carbon County this will be done in coordination and consultation with the County.”	Planning Criteria 3 on Draft RMP/EIS page 1-6 (carried forward in Section 1.6.2 of the Proposed RMP/Final EIS) notes that planning decisions will be made observing principles of multiple use and sustained yield as set forth in FLPMA and other applicable laws. Reiteration of broad principles for each specific resource/use decision is not necessary. BLM coordination with the State and County is required by FLPMA.
Carbon County	Wildlife and Fish	Chapter 4, Fish and Wildlife Impacts, p. 203, Alternative D: Carbon County's position is that there are very significant impacts in every introduction or reintroduction of the larger and also some of the smaller species of wildlife into the resource area. These introductions or reintroductions impact the owners of the grazing allotments, private lands and their families.	The Proposed RMP/Final EIS analyzes the general impacts of introductions or reintroductions. The specific impacts of introductions or reintroductions will be addressed in project specific NEPA analyses that will address the County's concerns.
Carbon County	Wildlife and Fish	Decisions: Alt. D, p. 204,”BLM would continue to cooperate with and provide support to UDWR in reintroducing fish species into suitable habitats as determined appropriate through NEPA analysis. Reintroductions or introductions of both native and non-native species would be considered. (Same as Alternative B)”: Any decisions allowing this action will require notification of and consultation with the County.	Planning criteria 3 on Draft RMP/EIS page 1-6 notes that planning decisions were made observing principles of multiple use and sustained yield as set forth in FLPMA and other applicable laws. Reiteration of these broad principles for each specific resource/use decision is not necessary. BLM coordination with the State and County is required by FLPMA.
Carbon County	Wildlife and Fish	Big Game, p. 4-278: The term prescriptive grazing is by this dialog subverting livestock preferenced rights to wildlife. This is not in keeping with the TGA. Cooperative grazing to the benefit of both wildlife and livestock would be a better way to reduce the conflicts that the psychology of this analysis proves exists, and at the same time,	The alternatives allow for continued livestock grazing use in a manner consistent with the Taylor Grazing Act. This would not subvert livestock

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		accomplish a valid workable management system.	grazing to wildlife use, but would allow for use of forage by both wildlife and livestock.
Carbon County	Wildlife and Fish	Chapter 4, Livestock Grazing, Impacts to Fish, p 4-278: The impacts from livestock grazing are consistent with impacts from overgrazing by elk.	This section of the Draft RMP/EIS discusses the impacts from livestock grazing on fish. The impacts from fish and wildlife decisions are detailed in a different section of the Draft. The Proposed RMP/Final EIS has been formatted to describe impacts on Fish and Wildlife from all decisions in Section 4.2.8.
Carbon County	Wildlife and Fish	Section 2.16 Recreation; Lower Gray Canyon High-Use Area: The affected counties and appropriate state agencies should be involved in the development of a suitable management plan in coordination and cooperation with the BLM to enable the cooperators to give relevant input to meet social and economic needs.	An activity level plan such as a plan for the Lower Gray Canyon Recreational Management Area would be developed in coordination with the State and County.
Carbon County	Wildlife and Fish	Coal impacts to Fish and Wildlife, p. 4-438: Add to the impact analysis, “The fact that the mines are going to be located in and adjacent to sage grouse, elk, and mule deer habitat does not pose a long term impact to any of these species. In fact much of the habitat requirements will develop closer to the mine sites as a result of the development. Given the surface foot print of mining facilities, permanent habitat abandonment, habitat fragmentation, and harassment due to increased human presence is quite unlikely.”	The proposed language was not added because the existing language of “temporary impacts” is accurate. Temporary is short-term.
Carbon County	Wildlife and Fish	Impacts to Fish and Wildlife, page 4-444: Seasonal use restrictions should not apply to maintenance activities on existing oil and gas facilities.	Appendix G of the Proposed RMP/Final EIS exempts maintenance activities from these restrictions.
Carbon County	Wildlife and Fish	Gray Canyon Wildland Management Area (WMA), pages 2-41, 42: The no Action Alternative, with added language, should be the Preferred Alternative. Add: •The Gray Canyon WMA would continue to be managed for wildlife, watershed, and recreation. •Off-highway vehicle (OI-IV) use in Gray Canyon WMA is partially open and partially limited to designated routes, as is consistent with applicable County plans. (See Map 2-12.). •Grazing is excluded, until such time as grazing removal has been shown to: Disrupt the orderly use of the range, Disrupt or impair the fiduciary responsibilities of States under the provisions of their Enabling Act, Breach the Secretary's duty to adequately safeguard grazing privileges, Be contrary to the protection, administration, regulation and improvement of public lands within grazing districts, Hamper the government's responsibility to account for grazing receipts, or Impede range improvements as foreseen by the TGA, PRIA and FLPMA, Have violated 1712(e)(2, of FLPMA, the appropriate regulations in CFR 4100. TGA or PRIA.	The comment is not consistent with the objectives of the Gray Canyon WMA. The area is proposed for special restricted use management that would not be protected as proposed in the comment. The laws referred to in the comment protect the public lands from degraded conditions. All of these laws contain fundamental protection and conservation under the principles of multiple use and sustained productivity. The laws also have provisions for changing management practices that result in deterioration or are superseded by other laws or orders. Each requires periodic collection of data or evaluation to determine the effectiveness of current management and to make any adjustments as needed or mandated.
Carbon County Recreation	ACEC	In the document, ACECs are proposed in all of the alternatives without consideration for not designating an ACEC. A full range of alternatives should be developed to include a full range of management prescriptions, including no designation to insure proper analysis. There was no attempt to provide a prescription that would protect values of concern without an ACEC designation. Handbook 1613 further provides, "If, however, there are issues associated with the management of the potential ACEC, the alternatives analyzed in detail shall reflect a reasonable range of management prescriptions for the	Please see general comment response #131

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		potential ACEC." This was not accomplished in this document.	
Carbon County Recreation	ACEC	The ACEC tool was intended by Congress to be limited in its scope to areas where it was necessary to protect AND prevent (not either/or) irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes or to protect life and safety from normal hazards. The designation is not appropriate when relevant values are merely subject to some impairment. The threat must rise to a level of actual damage. Damage that is threatened or that is temporary does not fit the criteria for consideration as an ACEC. Oil and gas operations are temporary and have only a temporary effect on the landscape and should be allowable with appropriate stipulations and reclamation standards.	Please see general comment response #153
Carbon County Recreation	ACEC	2-82, Nine Mile Canyon: How does SPNM affect access to oil and gas locations? It should define facilities to include recreation facilities. A classification of SPNM is in conflict with a VRM III viewshed and should be modified to meet the VRM class or made clear that this alternative's restrictions on facilities applies to recreation. Facilities are permitted in a VRM HI.	There is no inherent conflict between VRM Class III and ROS SPNM. The impacts of SPNM management are analyzed for each of the resources and uses addressed in Chapter 4 of the Proposed RMP/Final EIS. Also see general comment response #50.
Carbon County Recreation	ACEC	In several of the alternatives mineral entry is listed as "open" yet listed as recommended for withdrawal on Map 2-32 to 2-36. Map or text must be corrected.	Maps 2-35 to 2-39 (Areas Recommended for Withdrawal from Mineral Entry) have been updated.
Carbon County Recreation	ACEC	2-106, Intro, Congress Mandates the Designation of ACECs: Congress did not mandate the designation of ACECs. It provided a definition of an ACEC in Sec.103 (a) and at Sec.102 (12) directed that regulations and plans for ACEC be promptly developed. BLM regulations in 43 CFR 1610.2-2 provide the process for the designation of an ACEC. It is through this process that designations are made. The wording as presented is misleading and incorrect. Strike or rewrite this section to reflect the ACEC application.	Table 2-19 of the Proposed RMP/Final EIS identifies the goals and objectives of ACEC designation with wording that is consistent with FLPMA and the regulations.
Carbon County Recreation	ACEC	2-106, 2-107, 2-108, Alt. D, Big Flattops ACEC, Bowknot Bend ACEC: As proposed Alt. D describes management equal to wilderness (defacto wilderness) and is in violation of the settlement of Utah v. Norton. Alt. D must be changed or Alt. A or B must be the preferred alternative.	Please see general comment response #30
Carbon County Recreation	ACEC	2-110, Dry Lake: ACECs or other special designations that are managed as NSO for oil and gas and avoided for ROW grants must make allowances within those designations for access to School Trust Lands. The federal government gave lands to the state of Utah for the benefit and education of its citizens. Because of this original grant, the BLM cannot now deprive SITLA of its ability to produce revenue from those lands. Impacts of actions that preclude access to Trust Lands or hamper development of Trust Lands should be analyzed by the BLM as to their negative effect and whether or not the actions are consistent with the original federal grant given the state. Access to private lands and removal of product must be provided for.	Access to private and School Trust Lands over public lands is required by law, regulation and case law. Nothing in this RMP can eliminate access guaranteed by Congress or required by the regulations and the courts.
Carbon County Recreation	ACEC	2-110, Dry Lake ACEC: The NSO for oil and gas and avoidance for ROW grants is not consistent with uses permitted elsewhere in the alternative. (See previous comments regarding NSO for large tracts). Oil and gas should be analyzed and reported as a withdrawal. If this area remains NSO, both oil and gas and ROW activities can be designed to prevent damage to cultural resources; this is a current practice and provided for in law and regulation that govern such resources. The "No Actions" must be selected as the preferred, as it's the only alternative that provided for reasonable and balance use of resources in this area. An ACEC is not needed to provide protection to cultural resources as they have adequate protection under law and regulation.	Please see general comment response #30
Carbon County Recreation	ACEC	2-111, Bottom of Page, 1-70 ACEC: The alternative proposed here are for an area that is split lengthwise by 1-70 the heaviest traveled highway in the region. It is clear that the management prescription, which is prohibitive in nature, fails to consider the existing impacts on the area resources, including scenic, which is the resource this	See general comment response #127. The I-70 ACEC is an existing ACEC and the management prescription has worked to protect the area. The

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		ACEC purports to project. The existence of 1-70 inside the designated area would indicate that it would be difficult for the current or proposed extension of the ACEC to pass the required relevance and importance requirements in 43 CFR 1610.7.2 if it is properly applied. Additionally, a review of Appendix 26 indicates by its absence that no analysis was done on the proposed extension of the current ACEC. The ACEC proposed here was not developed in accordance to regulation or proper analysis. The following are comments on each of the proposed management prescriptions: All Alternatives: There is not indication of the width of this ACEC in the DEIS. The only indication of size is the acreage listed in Chapter 4. The width should be reported in Chapter 2, 3, and 4. Closed to disposal of mineral materials: As the highway is the point of reference for viewing the scenic values, topography provides adequate screening of much of this area from the highway. Thus, there are areas where mineral materials could be developed with no impact to scenic values of concern. This was not considered. Avoid for ROW grants: The definition for "avoid" is contained in the DEIS. Thus, an assumption has been made that the definition for "avoidance areas" applies here. That definition would indicate that any ROW granted across this ACEC would "have to be compatible with the purpose for which the area was designated". It is unlikely that a pipeline, powerline, or other transportation ROW could meet this standard. The impact of this management prescription can not be analyzed as impacts are unknown. The compatibility portion of the definition must be struck and the management prescription in all alternatives rewritten to insure reasonable ability to grant ROW across the ROW.	BLM sees no need to change the prescription but only the area to which it applies The I-70 ACEC was designated in the 1991 San Rafael RMP. The existing prescription is VRM Class I to protect the natural landscapes visible from Interstate 70 thus preserving the visual experience of the public traveling the interstate. The width of the I-70 ACEC varies and is shown on maps 2-45 to 2-49 of the Proposed RMP/Final EIS. Mineral materials could be accessed outside the ACEC. Right-of-way avoidance areas are areas to be avoided but may be available for location of right-of-ways with special stipulations. The impacts of Land and Realty decisions have been expanded and clarified in the Proposed RMP/ Final EIS.
Carbon County Recreation	ACEC	2-112, Bottom, Muddy Creek ACEC: Again, an ACEC is proposed that is essentially equal to wilderness. See previous comments in the section regarding managing for defacto wilderness and the settlement of Utah v. Norton. Here the DEIS fails to propose and analyze a full range of alternatives. A large portion of this area is in an area of high mineral potential yet the loss of access to these minerals is not analyzed in Chap. 4. See previous comments regarding NSO greater than 1/4 mile from nearest surface access. Alternatives here lists area as open to mineral entry. However, Map 2-36 shows the area in and outside the WSA to be recommended for mineral entry withdrawal. See previous comments on VRM Class I on scenic areas (1-70 ACEC). Rewrite this alternative with a full range of alternatives and with proper analysis of impact to mineral development. There are no acceptable alternatives as written.	The Muddy Creek potential ACEC would be managed as open to mineral entry with notice or plan of operations required before activity on claims. Maps 2-35 through 2-39 in the Proposed RMP/Final EIS do not show the Muddy Creek potential ACEC as recommended for withdrawal from locatable mineral entry.
Carbon County Recreation	ACEC	2-115, San Rafael Reef ACEC: See previous comments on management as defacto wilderness and counter to wilderness settlement. Rewrite this alternative with a full range of alternatives and with proper analysis of impacts to mineral potential.	Please see general comment response #131 and #141.
Carbon County Recreation	ACEC	2-117, Segers Hole ACEC: See previous comments on NSO on large tracts. Here is proposed an NSO. This area is high in mineral potential. This area is a current ACEC and is proposed to be a maintained as one. It is not clear if the management prescriptions listed here are the current ones. Area is shown here as open to mineral entry but is reflected as a withdrawal on maps. Rewrite to state management prescriptions and analyze and disclose impacts.	Please see general comment response #152. Map 2-35 through 2-39 of the Proposed RMP/Final EIS correctly show areas recommended for withdrawal under the various alternatives.
Carbon County Recreation	ACEC	Sid's Mountain: It appears that the proposal to manage this area as open to oil and gas is in error as Maps 2-28 to 2-31 list this area as closed. Map 3-26 lists Sid's Mountain as a W SA which is not reflected in the "No Action" Alternative. Maps 2-42, 44, 45, and 46 list the same area as an ACEC. On Page 2-103 this area is proposed to be included in the San Rafael Swell SRMA with similar restrictions. Area is listed as open to mineral entry in the	Table 2-18 of the Proposed RMP Final EIS explains that BLM would continue to manage all WSAs (Map 3-28) according to the Interim Management Policy for Lands Under Wilderness Review (IMP, BLM

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		alternatives but shown as proposed for withdrawal on the maps. See previous comments on VRM Class I. A VRM Class I is proposed here but is inconsistent with open to oil and gas with minor constraints and open mineral entry. Alternative A is the only viable alternative presented.	Handbook H-8550-1) until legislation is enacted to either designate the areas as wilderness or release them for uses other than wilderness. The only decisions related to WSA management to be made in the Price RMP are VRM and OHV designations. Under the Mineral Leasing Act, and the Wilderness IMP, WSAs are closed to leasing. Since the Sid's Mountain ACEC would be mostly within the Sid's Mountain WSA, the ACEC would be closed to leasing on the WSA portions of the ACEC. This is shown on Map 2-34 of the Proposed RMP/Final EIS. Table 2-19 explains ACEC management for the Sid's Mountain ACEC. For the No Action Alternative, the original ACEC management prescription for oil and gas leasing is open to leasing subject to minor constraints, but WSA management takes precedence and those portions of the ACEC within the WSA would be closed to leasing unless Congress releases the WSA for uses other than wilderness. Maps 2-35 through 2-39 in the Proposed RMP/Final EIS show the areas recommended for withdrawal from locatable mineral entry. The VRM Classes are shown on Maps 2-1 through 2-5; ACECs on Maps 2-45-2-49, and fluid mineral leasing on Maps 2-30 through 2-34. The management prescriptions for the potential Sid's Mountain ACEC are consistently applied.
Carbon County Recreation	ACEC	2-121, Proposed ACECs: Map 2-46 shows an ACEC of 17,446 acres titled "Horseshoe Canyon". It is not listed in this section or in Chapter 4 analysis.	Appendix L of the Proposed RMP/Final EIS addresses the Horseshoe Canyon nominated ACEC. The Price FO portion of this nominated area was evaluated by the Price FO and determined to meet relevance and importance criteria. It was included as part of the Lower Green River potential ACEC and was brought forward for ACEC management in Alternatives B, C, and E of the Proposed RMP/Final EIS. Portions in the Richfield FO were evaluated by the Richfield FO, and likewise were found to have important and relevant values. The Richfield portion of the Horseshoe Canyon potential ACEC would be managed as an ACEC under alternatives C and D of the Richfield Resource Management Plan/Draft EIS.

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Carbon County Recreation	ACEC	2-123, Range Creek ACEC: There are no values listed in the relevance and importance analysis that are not or could not be protected with current policies and regulations. The proposed management prescription is management to a non-impairment standard (defacto wilderness), see previous comment on wilderness settlement. The closure for oil and gas is in a high potential area for oil and gas and coal bed methane. The mineral entry closure has potential coal reserves. No VRM class has been designated here. The "No Action" Alternative and Alternative A are the only viable alternatives as others lack proper analysis of need and impacts. There are SITLA lands within the ACEC that could not be developable if ACEC is designated. These losses must be analyzed.	Please see general comment response #157
Carbon County Recreation	ACEC	2-123, Bottom of Page, Closure To Oil and Gas Mineral Materials and Mineral Entry: These closures include the portion of the ACEC on the west side of the canyon where BLM land is scattered and are a fraction of the area covered by the ACEC. Clearly this proposed ACEC does not consider manageability. This was not considered when the ACEC was proposed. Properly another alternative should be proposed to consider these issues. It would appear that the BLM may try to control management of state and fee lands here through connected federal action if they are involved in permitting uses associated with these lands. (ROW, APDs, etc.)	Please see general comment response #131
Carbon County Recreation	ACEC	2-124, Nine Mile Canyon ACEC: Alternatives B, C, and D refer the reader to Map 2-44, 2-45, and 2-46 which are to indicate Vernal Alternative A. There are no such references on those maps and there should not be. The meaning of the references is unknown.	ACEC descriptions on page 2-124 regarding Nine Mile are confusing. There is an existing and proposed Nine Mile Canyon ACEC in the Vernal RMP. The BLM Vernal and Price offices have coordinated the size and the management prescriptions so that the boundaries would be contiguous and the management would be the same.
Carbon County Recreation	ACEC	2-129, Uranium: The ACEC fails to meet the test for relevance and importance as the cultural resources can be protected within current law policy and regulations. The fact that the area is proposed to be open for mineral entry, mineral materials and NSO for oil and gas is not consistent.	Please see general comment responses #30, #153, #157. Appendix L in the Proposed RMP/Final EIS explains BLM's findings relative to ACEC values.
Carbon County Recreation	ACEC	4-393, Top of Page, All Alternatives: It is impossible to determine the meaning of this set of alternatives. The heading "Impacts from lands and realty from ACECs" makes no sense. This set of alternatives divides the impact analysis on withdrawal from the decision on withdrawals on Page 4-391 and Page 4-392.	Chapter 4 in the Proposed RMP/Final EIS addresses impacts of ACECs in terms of relevant and important values rather than by all ACECs together. This discloses the impacts of each individual ACEC.
Carbon County Recreation	ACEC	4-485, Top 1st Paragraph 2nd Sentence, Assumptions: The goal of an ACEC is to protect relevant and important values not to be complementary. Doesn't make sense as written.	The ACEC assumptions stated in the Draft RMP/EIS appear as goals in Table 2-19 of the Proposed RMP/Final EIS. The language of the goals focuses on prevention of irreparable damage to important historic, cultural, or scenic values; fish and wildlife and botanical resources.
Carbon County Recreation	ACEC	4-485, 2nd Paragraph, Alternatives Where Some Potential ACEC Would Not Be Identified: If there are relevant and important values existing in these areas they should have been proposed as ACEC. If they were proposed and not designated the values were not relevant and important and are likely, or should be, protected by another management prescription. This appears to second guess the decision. The wording here, and above, implies the ACECs were contemplated and then relevant and important values were then determined to support the	BLM Manual 1613 section .22(B) provides that ACECs can vary across alternatives both by alternative management provisions as well as alternatives that do or do not contain a given ACEC. Evaluating a range of alternatives allows the

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		designation.	BLM to assess the impacts of not establishing certain ACECs and allows comparison of the impacts of alternatives.
Carbon County Recreation	ACEC	4-517, Impact Analysis: Here and on the next 12 pages the analysis for 22 ACECs is combined into one analysis. This is not consistent with how the impact analysis was made on other resources and is difficult to analyze to the point that it could be considered not fully disclosed impacts. Rewrite this section to be consistent with other section and clearly disclose impacts.	Please see general comment response #152
Carbon County Recreation	ACEC	4-525, Alternative D mid-page, Nine Mile Canyon: Here it states, "Nine Mile Canyon ACEC is NSO". Map 2-31 shows only the canyon to be NSO. Chapter 2 is not clear but implies only the canyon is NSO. In a recent meeting with PFO staff we were assured only the canyon was NSO. Reading further the area in the ACEC is a VRM Class HI with minor restrictions on oil and gas development. This is a major flaw in the analysis.	In the Proposed RMP/Final EIS the decisions for and analysis of Nine-Mile Canyon are consistent with each other. In the Proposed RMP, the Nine Mile Canyon ACEC would be in the canyon and would be NSO.
Carbon County Recreation	ACEC	4-517, Impact Analysis: A review of the management situation analysis reveals that existing ACECs were not analyzed as to the need to be continued or dropped. There is no analysis of the need for expanded or additional ACEC. In the planning issues section of the MSA, ACECs were mentioned in two sections, and then only briefly. In Mineral Resources it is mentioned as an issue associated with mineral resources. In Wilderness and Special Designations it says the RMP will consider ACEC designations and that comments (public) indicated support for and against such designations. This falls short of the analysis contemplated in 43 CRF 1610.4-4 where it states, "The analysis of the management situation shall provide consistent with multiple use principles, the basis for formulating reasonable alternatives". Had these and the provisions of the planning handbook been followed a wider range of alternatives would have been possible. Failure to follow regulations on the development of alternatives is a serious flaw in the DEIS.	Please see general comment response #131
Carbon County Recreation	ACEC	BLM Handbook 1613 provides that existing ACECs are to be reconsidered in the planning process, they were not.	Please see general comment response #127
Carbon County Recreation	ACEC	2-111, Bottom of Page, 1-70 ACEC: There is a range of alternatives offered as to the length of this designation but not for the management prescriptions that are to be applied to it. Guidance and regulation provide that a range of alternatives are to be developed and analyzed here but DEIS fails to meet that requirement.	Please see general comment response #131
Carbon County Recreation	ACEC	Sid's Mountain: Additionally, the level of restrictions placed on other resources would indicate that the intent is to manage this area to a standard of non-impairment (defacto wilderness). See previous comments on this issue. Rewrite the alternative to make clear the intent and explain the purpose of over-lapping management.	Please see general comment responses #37 and #156
Carbon County Recreation	ACEC	2-123, Range Creek ACEC: This ACEC is proposed to protect cultural and natural process values. "Natural process values is not defined in the DEIS and are unknown values that will be managed under the ACEC."	Please see general comment response #129
Carbon County Recreation	ACEC	2-124, Nine Mile Canyon ACEC: The description as to the status of oil and gas is difficult to determine the way it is written. It appears to say that the areas covered by an ACEC and that are within the canyon rim would be NSO while lands outside the rim would be open with minor constraints.	In the Proposed RMP, the Nine Mile Canyon ACEC is in the canyon and would be NSO. Maps 2-30 through 2-34 of the Proposed RMP/Final EIS show fluid mineral leasing decisions by alternative and Maps 2-45 through 2-49 show ACEC boundaries by alternative.
Carbon County Recreation	ACEC	2-124, Nine Mile Canyon ACEC: This is a coal potential area and a high oil and gas potential area. The impacts to these resources must be analyzed and are not. Rewrite fully to disclose intent.	Please see general comment response #152

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Carbon County Recreation	ACEC	2-129, Uranium, Alternative C list the area open to mineral entry but Map 2-35 shows it to be proposed for withdrawal.	Table 2-19 in the Proposed RMP/Final EIS indicates that the Uranium Mining Districts ACEC would remain open to mineral entry under Alternative C. Map 2-38 in the Proposed RMP/Final EIS correctly shows the ACEC as open to mineral entry.
Carbon County Recreation	ACEC	2-111, Bottom of Page, 1-70 ACEC: Manage as VRM Class I. VRM Class I is inappropriate. The BLM's visual resource handbook provides that Class I is to be applied to areas where previous decisions have been made to manage for natural landscapes. The presence of a four lane highway interchange, dwellings, intersection road, and other manmade attributes would indicate that a VRM II would be more consistent with protection of the scenic values and comply with the BLM handbook for such designation.. The width of the designation appears to be consistent along its length. This would indicate that no point of reference was used to determine the view shed. This is not consistent with the BLM handbook on conducting a VRM inventory. The boundaries of the ACEC should be redrawn to reflect the viewshed using the highway as the reference point and the VRM class changed to Class II. There is no justification for going outside of the viewshed from the highway as restriction associated with the highway to prevent access to the area of the ACEC for the most part. Approximately 20 miles of this ACEC has high potential for oil and gas. The restrictions in the alternative would add greatly to the cost of development as infield pipelines crossing the highway would or could be denied.	ACECs with relevant and important scenic values can be subject to management as VRM Class I to protect those values. The ACEC was established to protect the foreground visual values but a buffer zone assists with protection of the viewshed along the highway. Also see general comment response #140.
Carbon County Recreation	Cultural Resources	4-408, Top of Page, ACEC, Impacts to Nine Mile: Here a single use is pulled from the list of resource uses apparently to highlight or propose an impact against cultural resources from the preferred alternative. It ignores other protections of these resources. Here the DEIS deviates from format and content in the rest of Chapter 4. This could be interpreted to be biased against multiple-use and development. Further review of the impacts on 4-410, the impacts to ACECs is listed as "not significant". Strike as this discussion is not relevant to the analysis.	The format of the document has been changed to be consistent with other resources and the analysis has been changed to match new proposed ACEC alternative.
Carbon County Recreation	Cultural Resources	4-439, Impacts to Cultural Resources: Here it states that there will be no impact to cultural resources on over 701,900 acres. There is no indication what this figure is based on but one would assume it to be the total of oil and gas closed areas and NSOs, but it is not. The source remains unknown. Rewrite.	Please see general comment response #121
Carbon County Recreation	Cultural Resources	4-456, Bottom, Decisions: Here and at Page 2-100 it provides geophysical operations would be allowed consistent with existing regulations. In the analysis of impacts to cultural and paleontology resources it implies that areas withdrawn from mineral entry are not included. The impact analysis on the two resources contains restrictions that are not in the alternative or the decision repeated in this section. This inconsistency could be interpreted as biased. Rewrite analysis to accurately reflect the provision of the alternative.	Please see general comment response #121
Carbon County Recreation	Lands and Realty	2-91, Bottom of Page, Proposed Withdrawals: Throughout the document there are proposals to withdraw various minerals from general land laws. Such withdrawals should be reported and tabulated here to fully disclose the purpose and amount withdrawn.	Table 2-16 of the Proposed RMP/Final EIS contains updated information on withdrawals.
Carbon County Recreation	Minerals and Energy Resources	This paragraph fails to mention that there is specific guidance in the form of instruction memorandums that address EPCA and how Reasonable Foreseeable Development (RFD) and other related energy issues are to be addressed in the planning process. They are IM 2004-089 Policy for Reasonable Foreseeable Development Scenario for oil and gas, IM 2003-233 Integration of the Energy Policy and Conservation Act (EPCA) inventory results into the land use planning process and IM 2003-13 on the same subject, IM 2004-110 Fluid Mineral Leasing and Related Planning and National Environmental Policy Act (NEPA) process. These IMs should have been used to guide the planning process for energy and minerals and should be listed here and guide the	Please see general comment responses #49, #51, #52 and #53

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		development of RFD in this document. Failure to accurately project Reasonable Foreseeable Development prevents disclosure of socio-economic impact and possible impacts of development on the environment. It appears that BLM has taken the position that these directives were issued too late to be utilized in the development of the RMP/RIS. It should be noted that the BLM Handbook H-1624-1, Planning For Fluid Mineral Resources, was in existence at the time. It appears it was not followed either.	
Carbon County Recreation	Minerals and Energy Resources	The DEIS statement that it would impose a "ceiling" of well numbers conflicts with BLM policy and must be changed to reflect the direction contained in IM 2004-089.	The RFD estimates the number of wells to be drilled to predict the environmental effect. The RFD does not constitute a limit on the number of wells that can be authorized. See general comment response #48.
Carbon County Recreation	Minerals and Energy Resources	The Minerals Potential Report as the basis for the RFD does not address significant hydrocarbon-bearing zones in the planning area. Some of these areas have been identified for several years. For example, in the 1995 United States Geologic Survey play assessments several zones were identified. Specifically plays 2002, 2003, 2004, 2005, 2016, and 2018 were not mentioned in the Minerals Potential Report nor analyzed in the DEIS/RMP.	Please see general comment response #51
Carbon County Recreation	Minerals and Energy Resources	In order to comply with the FLPMA and BLM policy an RFD should be developed that considers the following information and USGS 1995 Play Assessments, the analysis of which is wholly absent from the Minerals Potential Report: * Play 2016: W of Green River, Wasatch & Mesaverde Tight Sands, Continuous-type. * Play 2018: Mesaverde Tight Sands, basin Flank, Ro>l.1, drlg depths < 15K. * Play 2003: Upper Cretaceous Sandstones, including the Mesaverde, * Conventional sandstones traps (Structural, Stratigraphic and combination Struct/Stratigraphic), updip from RO > 1.1, both east and west of Green River. * Play 2004: Conventional Dakota and Jurassic reservoirs; appears to be depth limited at approx. 13,000'. * Play 2005: Conventional Permian and Pennsylvanian sandstones and carbonate reservoirs. * Play 2002: Conventional Tertiary oil and gas (like an updip from Monument Butte Complex, `black wax,' waterflood) plays. * Other sources of data in addition to the UGS "To be Released in 2003" Bulletin 132 * Potential Gas Committee - publishes gas resource potential for all domestic basins every 2 years. * AAPG Sectional and Annual Meetings with individual geoscientists' presenting papers. * Other regional geologic societies, like the Rocky Mountain Association of Geologists (RMAG), in specific programs, meetings and symposia. * Interview with Industry. * Interviews with Price District BLM employees with oil and gas experience. * The RFD should also take into consideration the following elements to help in planning for mineral development. These factors can be indicative of interest in a particular area for oil and gas development. * Nomination of lands (EOI), both Fed & State. * Seismic permit requests. * Request for drilling permits * Wells drilled	Please see general comment response #51
Carbon County Recreation	Minerals and Energy Resources	Throughout this DEIS it is proposed that areas designated as NSO could be accessed by directional drilling. The DEIS does not analyze that capability. The DEIS falls short of analyzing the impacts of the establishment of	Directional drilling is an example of how NSO areas could be accessed. It should not be assumed that

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		NSOs, the capability of directional drilling in these areas and the recoverability of the mineral resources in them. A recent analysis in an adjoining resource area indicates that directional drilling for gas increases the cost for specialized personnel and equipment and time, and as a result, increases drilling cost about 19% or $140,000 per well. This does not include cost associated with risk, such as, sticking of drill strings or lodging ` equipment. Additionally, it is economically impractical to directionally drill wells to a measured depth of less than 5000 feet.	directional drilling is the only method of recovering oil and gas from areas with NSO stipulations. See general comment response #16.
Carbon County Recreation	Minerals and Energy Resources	Under Actions Common to All Alternatives at 2.8.5, Minerals and Energy Development, BLM indicates it will, "Acknowledge future development for coal resources in areas where coal bed natural gas development is taking place." On page 2-98, it is asserted that "BLM would identify priority energy resource in conflict areas to promote safe and efficient extraction of energy resources" and that "BLM would require dual resource leasing and development in the same areas." We have several concerns with respect to these statements: * It is unexplained what process BLM will use to "identify the priority energy resource in conflict areas." The parameters of such decisions must be established in the RMP and not deferred until a conflict arises. * Since dual leasing and development of coal and CBNG resources will be required in the same areas, has the Price Field Office adopted a policy to resolve potential conflicts between coal and CBNG? We strongly recommend that. if such a policy has not been developed, one needs to be formulated with both the coal and natural gas industries' involvement. * BLM apparently fails to understand that the processes of developing coal and CBNG are not necessarily compatible and that it will be necessary to establish which lessee has priority rights over the other, e.g., first to lease, first to develop. Failure to settle the conflict issue in the RMP will likely result in future management problems and possibly needless litigation.	Please see general comment response #122
Carbon County Recreation	Minerals and Energy Resources	BLM claims in Appendix 23 to acknowledge the Presidents National Energy Policy which directs BLM to examine land status and lease stipulation impediments for 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). However, BLM merely identified the volumetric data in the Affected Environmental section of the DEIS, prepared a RFD scenario, included mineral data in the Analysis of the Management Situation (AMS) and outlined lease stipulations by alternative. While this information is relevant, BLM has clearly missed the intent of Instruction Memorandum 2003-137 which is to balance environmentally responsible energy development with sensitive resources. Nowhere in the DEIS has BLM demonstrated that it actually utilized this information in the land use planning process, e.g., ensuring that access and availability of the public land for energy resources are not unduly restricted.	Please see general comment responses #18, #49 and #52
Carbon County Recreation	Minerals and Energy Resources	Issue: Surface Disturbing Activities: To apply surface disturbance for oil and gas to all Surface Disturbing Activities (SDA) is not practical. As an example: given the definition of SDA in this document, it could be construed to apply to grazing (livestock, wildlife, and wild horse). The nature of these activities is radically different than Oil and Gas disturbances. Surface Disturbance for recreation is treated differently than other Surface Disturbances. This demonstrates a bias favoring recreation and against other uses. (Page 2-29, Alternative D, at bottom of page.)	The use of the term "surface disturbing activities" has been clarified in the Proposed RMP/FEIS. A RFD scenario has been developed for each alternative analyzed in detail. Appendix G in the Proposed RMP/Final EIS explains the application of surface stipulations to surface disturbing activities.
Carbon County Recreation	Minerals and Energy Resources	2-101 maps, Alt. D, Mineral Withdrawals: It should be specific on which ACECs minerals will be withdrawn. As indicate not all ACECs will be. Please refer to opening statements on ACECs. They were not intended to be used to manage land to a non-impairment standard; they are intended to prevent irreparable damage to resources. Here it provides that NSO areas in the listed designations would be withdrawn. It is proper to withdraw areas proposed to be closed to leasing but not NSO. NSO lands are available for leasing. If the intent is to withdraw	Table 2-17 of the of the Proposed RMP/Final EIS arrays locatable mineral decisions by alternative, and Table 2-19 presents the locatable mineral decisions for each potential ACEC for each RMP

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		these lands they should be analyzed as closed not NSO.	alternative analyzed in detail.
Carbon County Recreation	Minerals and Energy Resources	4-4, 4.2.2, Projections and Activities 1st Bullet: Here the DEIS lists the projections and activities that could generate cumulative impacts. The first bullet lists regional minerals and energy development or operations. A review of the material presented in Chapter 4 reveals that only currently developed areas were analyzed for projected development and cumulative impacts. Example: Last Alternative "D" on Page 4-524. In the analysis of the impacts on leasable minerals from ACECs it states, "Range Creek ACEC and Nine Mile ACEC would be the only ACECs proposed in the oil and gas development area", these are the only ones reviewed in the section on impacts to minerals and energy. A review of Map 2-46 and 3-21 indicates that there are other ACECs in the resource area that were not analyzed with respect to the impact of the ACEC on leasable minerals or the cumulative impact of these resources on other resources. In short, the development potential and impacts on thousands of acres were not analyzed. Since it is clear that in order to fully analyze the impacts of the proposed ACECs on leasable minerals and impact of potential development of these areas on other resources. Reasonable, foreseeable developments of ALL potential mineral resources must be analyzed. This must be done to accomplish 4.2.2 and to comply with NEPA. Chapter 4 must be redrafted to fully consider the full development potential and analyze and disclose the impact to these and other resources.	Please see general comment responses #49 and #52
Carbon County Recreation	Minerals and Energy Resources	4-189/4-190, Alternative D, Impacts to Minerals and Energy: Appendix 8 shows no surface occupancy as the surface use restrictions for many of the listed species. There is no analysis of that requirement here. Rewrite this section to reflect the impacts of NSO or change Appendix 8.	Appendixes 8 and 16 have been corrected and combined into Appendix G in the Proposed RMP/Final EIS. The Final EIS includes additional analysis of the impacts of restrictions on minerals and energy.
Carbon County Recreation	Minerals and Energy Resources	4-419, Top of Page, Assumptions: The 1st bullet here provides that existing leases would be managed under stipulations in effect when leases were issued. Management prescriptions in this RMP will impact some, if not all, development of these leases. The layering of ACEC, VRMs, SRMAs, and other special designations will, in some cases, require the development of an EA or EIS and possibly mitigation to secure the necessary permits. This impact must be disclosed and analyzed as time and cost will increase thus inhibiting resource development. This sentence further states that the new stipulation of this RMP may not apply. The analysis must show the impacts of the new stipulation unless it is clear that waiver or modification would apply if current leases were to be developed under management prescription contained in this draft.	BLM recognizes valid existing rights and stipulations proposed in the DEIS would only apply to new leases. New lease stipulations would not be applied to valid existing leases due to the new RMP. The requirements for compliance with the National Environmental Policy Act apply to all proposed actions, regardless of stipulations.
Carbon County Recreation	Minerals and Energy Resources	4-419, 5th Bullet, Areas Where Development Would Reasonably Occur: To fully disclose and analyze the impacts of the proposed management prescriptions the analysis must address the impacts to all of the mineral potential area. The assumption here provides for analysis for approximately half of the mineral potential. To assume that all mineral development would occur north of Highway 10 and 6 is a false assumption and not based on science or fact or the mineral potential report. Failure to analyze the entire mineral potential area is also failure to disclose possible impacts from mineral development on other resources. The assumption here contradicts the statement on Page 3-53 under Oil and Gas which states, "Development of oil and gas is considered likely in the high potential areas over the next 15 years". Rewrite so as to provide for analysis and full disclosure on the entire mineral potential areas.	The majority of the well pads contained in the RFD are in the Book Cliffs and Tavaputs areas which are north of Highways 10 and 6. The number of acres closed to oil and gas leasing (including those in WSAs) are accounted for in Table 4-17 of the Proposed RMP/Final EIS. Also see general comment response #52
Carbon County Recreation	Minerals and Energy Resources	4-419, Mid-Page, Significance Criteria: In the first two bullets it provides that 15% of the land available must be impacted before impacts are significant. These percentages are baseless. If a proper analysis was made of the value of mineral resource potential it would reveal that even a 5% loss of lands in mineral potential areas is	In the FEIS, significance criteria have been removed and are listed as assumptions for analysis. The impact analysis in the Proposed

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		significant. Rewrite these assumptions so the impact analysis will fully disclose the impact to the mineral potential.	RMP/Final FEIS is based on these assumptions.
Carbon County Recreation	Minerals and Energy Resources	4-423, Bottom of Page, Impact to Mineral and Energy: Here the DEIS reports that approximately 1/4 of a million acres would be closed within the known oil and gas reserve area with no mention of impacts. The assumption listed at the beginning of this section is that anything under 15% is not significant. A rough calculation based on the Mineral Potential Map would indicate the closure would be less than 15%, thus, no significant impact. It would take very little research to find the economic and social impacts from the loss of access to these high potential lands would be tremendous. Here, as elsewhere, the term "known oil and gas reserves" is used. The proper terminology for these areas is found in the mineral potential report and Map 3-21 where they are referred to as occurrence potential areas. To be consistent and for clarity the text should use the same terminology. Rewrite to correct terminology and to fully analyze and disclose impacts.	Please see general comment response #52
Carbon County Recreation	Minerals and Energy Resources	4-430, Top, Decisions: Here again Nine Mile Canyon ACEC has been singled out and its impacts displayed with the decision. Page 4-432 shows no impact to ACECs. Energy exploration and development does not have the impacts described here. These tracts may never be leased or developed. The impacts are presented as if they are explored or developed. Alternative A, B, and C states that closure prevented surface occupancy that would have disrupted soil. The above applies here. The addition of "when or if developed" would correct this. Strike this section for it is inappropriate and out of place. It is not relevant to the decision being analyzed.	The impacts of oil and gas leasing decisions and subsequent development are based on the Reasonably Foreseeable Development Scenario explained in Appendix M of the Proposed RMP/Final EIS. Impacts of oil and gas development on ACECs are analyzed in Section 4.4.2 of the Proposed RMP/Final EIS.
Carbon County Recreation	Minerals and Energy Resources	4-435, Mid-Page, Decision All Alternatives: Here is listed the decision as to the acres that are in each of the leasing categories for oil and gas. The acres assigned here do not match the same tabulation presented in Chapter 2 on Page 2-99. They do not match Tables 4-11 through 4-15 and the same table in the Executive Summary. It is not known to the reader which table is correct. Some of these categories are of as much as 412,785 acres. Failure to identify the correct acres in each leasing category invalidates the analysis of this section and others, including projections of RFD. Rewrite to correct figures and reanalyze sections that utilize these figures in their analysis and correct maps if needed.	The acreages and percentages of leasing categories have been corrected in the Proposed RMP/Final EIS. Acreages are given in Table 2-17.
Carbon County Recreation	Minerals and Energy Resources	4-460, Top of Page Alternative A,B,C,D, Decisions: The decision here and on Page 2-101 uses terminology applied to oil and gas NSO. The map lists closed area for locatable mineral entry but no other categories except the obvious, open. The analysis here is on locatable minerals but here and elsewhere (cultural) oil and gas appears in the analysis. Rewrite this section, analysis and disclosures are flawed. Here again, special designations are treated differently, i.e. WSAs, WSRs, and ACECs and could be interpreted as bias.	The Draft RMP/EIS language indicated that No Surface Occupancy for Oil and Gas leasing areas would also be recommended for withdrawal. To avoid confusion, the language in the Proposed Plan/Final EIS eliminates the explanation of the relationship of areas recommended for withdrawal to the oil and gas categories and presents only the areas "recommended for withdrawal" from locatable mineral entry.
Carbon County Recreation	Minerals and Energy Resources	4-461, Impact Analysis: The decision background discussed locatable. The decision is oil and gas. The analysis is for salable and locatable. The decision here should be changed to address locatable and salable.	The Proposed RMP/Final EIS presents the impacts of locatable and saleable mineral decisions for each resource and use.
Carbon County Recreation	Minerals and Energy Resources	4-469, Tables 4-11 to 4-15: None of these tables are consistent with tables of the same data elsewhere. See previous comments.	The acreages and percentages of leasing categories have been corrected in the Proposed RMP/Final EIS.
Carbon County	Minerals and Energy	4-526, Mid-Page Alternative B,C,D, Coal: Here it states that no reasonable and foreseeable coal development	The assumptions listed on page 4-419 of the DEIS

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Recreation	Resources	areas are in the ACEC. Map 3-19 indicates this area as potential coal reserves. The analysis fails to address why the development of these reserves are not reasonable or foreseeable.	state that two subsurface mines (Lila Canyon and North Horn) would be reasonably developed during the next 20 years. There are no RFD requirements for coal. Future development of coal would be addressed as implied in the Coal Report.
Carbon County Recreation	Minerals and Energy Resources	4-566, Alternative A, B, C, D, No Action, Impact to Minerals and Energy: Here it states suitable rivers would not affect the mineral resources and development as all suitable river segments are within mineral leasing categories 3 and 4. This is the first reference I have found to numbered categories. This leaves on to assume that 3 and 4 is the same as closed and NSO. The mineral leasing categories in these areas are based on their current status as WSAs. If released some of these lands would be open for oil and gas. The lack of management stipulations in Chapter 2 leaves future status questionable. A review of Maps 2-28 to 2-31 shows the San Rafael to be closed to mineral leasing, and the scenic portion of the Green to be closed to leasing with exception of a small portion of the lower Green which is NSO. The analysis of impacts in the section is seriously flawed.	The Price Field Office manages 11 Wilderness Study Areas (WSA) in a manner consistent with the Interim Management Policy for Lands under Wilderness Review (IMP). After considering comments on the Draft RMP/EIS, management of WSAs if released by Congress from wilderness consideration was revised in the Proposed RMP/FEIS to assume that WSAs would not be released during the life of the RMP. Should any WSA, in part or in whole, be released by Congress from wilderness consideration, proposals in the released area would be examined on a case-by-case basis for consistency with the goals and objectives of the RMP decisions. When appropriate, a land use plan amendment or amendments may be initiated.
Carbon County Recreation	Minerals and Energy Resources	4-577 Bottom Of Page, Oil And Gas Exploration and Development: This is a very poor analysis of future oil and gas development. The analysis is based on current and past production and a Utah Sate study almost 10 years old. It fails to recognize current trends, prices, and the relationship of supply to demand. Throughout the draft there are proposals to directional drill lands that are designated NSO. The cost of completion of these wells exceed those listed in Table 4.12.3.	BLM is not certain of the full context of the comment because there is no page 4-577 in the Draft RMP/EIS. However, the current and past oil and gas production data has been updated in the Proposed RMP/Final EIS. BLM has supplemented Chapter 4 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. Also see general comment responses #49 and #52.
Carbon County Recreation	Minerals and Energy Resources	Appendix 21 & 23, Fluid Minerals Reasonable Foreseeable Development: The RFD was previously commented on in the text. Here is discussion on how the RFD was developed. The direction for the preparation of the RFD is found in instruction memorandums (IMS) No. 2004-089, 2003-233, 2003-137 and 2004-110. These IMS should be cited as the basis for the development of RFD and the material here should show how they were applied to this draft with respect to development of management prescriptions, as the IMS address both planning and RFD. It would seem appropriate to combine Appendix 21 and 23 together.	Because the Price RMP revision effort was initiated prior to the Instruction Memoranda (IMs) cited in the comment, the Reasonably Foreseeable Development Scenarios (RFDs) for the Price RMP were not developed according to those instructions. However, an RFD has been developed for each

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			alternative analyzed in detail. Appendix M in the Proposed RMP/Final EIS explains the RFD scenarios for the Proposed RMP/Final EIS. Also see general comment response #53.
Carbon County Recreation	OHV Route Identification	2-86, OHV Recreation Alt. D: There are no open OHV areas shown on the maps and no acreage assigned to open use. The acreages open to limited use is overstated. Only land along designated routes is open 300' on each side. Beyond that, the lands are closed and the acreage figures and maps should reflect this. Massive closures of land formerly open to OHV use will increase use and impacts on non-BLM managed lands. BLM needs to work cooperatively with local governments and other land owners to orchestrate closures and limited use areas that are contiguous to or otherwise affect these lands. The DEIS fails to properly disclose or analyze the impact of the increased level of restrictions. Example: Lands currently open to OHV use are now in the limited category. There is no indication of a listing of acres open, closed, or limited in the DEIS. Page 4-277 discusses the percentages of lands that are available for OHVs use under the "No Action" Alternative and the Proposed Alternatives. This analysis fails to accurately portray the current status of OHV designation. Previous drafts list the following: Closed 9689 AC, Limited to Designated Roads and Trails, 1,590,540 AC, and Open 754,193`AC. The acreages are now presented as percentages and the open acres have been included with those limited to road and trails. Acreage outside of the area of the trail 300' is no longer open and should be analyzed and reported as such. In short, the DEIS fails to disclose that approximately 754,000 acres that were open are now limited to designated roads and trails.	Maps 2-15 through 2-19 in the Proposed RMP/Final EIS show Off Highway Vehicle Area Designations. Table 2-15 explains how OHV recreation would be managed. Also see general comment response #19.
Carbon County Recreation	Paleontology	Bottom Last Page, Assessment of Fossil Resources: An exception should be added to allow for surface disturbance in geologic formations that are known not to contain these resources.	Please see general comment response #91
Carbon County Recreation	Process and Procedures	The RMP/EIS is poorly written and contains numerous errors. The Table of Contents is often wrong and fails to completely list the contents. Tables containing critical data are inconsistent with respect to the same data. There are management prescriptions in Chapter 2 that are not analyzed in Chapter 4. For the most part the errors are addressed in the comments on the text. In all, these errors and omissions prevent the reader from fully analyzing the document and surely would prevent proper analysis and defense of decisions made by the decision maker.	The Proposed RMP/ FEIS has been revised and edited for reader clarity and understanding.
Carbon County Recreation	Process and Procedures	The planning document ignores and, in some places, is contrary to law regulation policy and directions that is to guide its development. These basic requirements are the Federal Land Policy and Management Act, Code of Federal Regulation, BLM's Planning Handbook, Instructional Memorandum, and NEPA. These documents establish a process by which planning is to be accomplished and that land use plans identify resources, consider the need to protect, consider present and future uses, and consider the relative scarcity of the values involved and weigh long teal benefits to the public against short teen benefits. The end result of this process is to be a plan based on these and other factors not listed, that allocates resource use and level of use on the subject lands. NEPA requires that such plans need to analyzed and disclose the impacts of management decisions made in such plans. If one tracks the development management decision contained in the DEIS it is clear that the above criteria was not followed in fact or in spirit.	The Price RMP is being prepared through the procedures outlined in BLM's national Planning Handbook, H-1601-1, including the procedural steps required by the CEQ for NEPA documents. BLM cannot respond further to this comment because the perceived deficiencies are not described.

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		The development of Management Prescription Alternatives is to be based on the Analysis of Management Situation (AMS) as provided in CFR43 at 1610.4-4. Here, it identifies the factors which are to be considered in development of reasonable alternatives, a review of the AMS demonstrates the lack of substantial analysis that is to be accomplished. Thus, many, if not most, of the alternatives presented in the DEIS are not based on the required analysis.	
Carbon County Recreation	Process and Procedures	The failure to properly develop alternatives within the required framework has resulted in a document that contains decisions that are baseless, inconsistent with law policy regulation, ect. In some cases they are undefendable and could be determined to be arbitrary and capricious. As an example, the limited range of management prescriptions proposed and supporting text indicates lesser or other prescriptions to accomplish perceived or needed protections were not considered. The failure to properly develop the decisions proposed in the draft is a fatal flaw.	Please see general comment response #2
Carbon County Recreation	Process and Procedures	We object that the analyses and discussions contained in this Draft RMP do not take into account routinely applied mitigation measures. The manner in which environmental consequences is tantamount to a worst case scenario. Section 1502 of the Council on. Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in the EIS which may be employed to reduce or entirely avoid impacts to other resource values. While this direction has apparently been construed to mean that only lease stipulations and other mitigation measures need be identified somewhere in the document, it is necessary to address all mitigation measures utilized during oil and gas exploration and development activities by incorporating them into the environmental consequences analysis. The Draft RMP does not address any type of mitigation until after it has described the worst case scenario. This does nothing more than fuel the flames of opposition to oil and gas activities. For example, no mention is made of the existing habitat enhancement fund that operators have been paying into for years. Monies from this fund have been used to improve big game habitat to offset current oil and natural gas activities. Additionally, the statement that runoff from roads would cause increased erosion impacting water quality and increasing sedimentation in streams is excessive because industry has typically engineered its roads to eliminate these impacts.	Please see general comment responses #2 and #54
Carbon County Recreation	Process and Procedures	Issue: Charts do not show totals: The charts here should show totals for each alternative so reader can readily see the impact of each alternative and make comparisons.	The Proposed RMP/ FEIS has been revised and edited for reader clarity and understanding.
Carbon County Recreation	Process and Procedures	4-1, Environmental Consequences: Throughout this chapter the first analysis is the impacts to resources followed by an analysis of impact to resource use. The analysis of impacts to resources fails to address all resources. Example: It addresses impacts to fire and fuel management but not to energy and minerals. Fire and fuel is a management issue not a resource.	The headings, "Resources" and "Resource Uses" and the categories under each heading are taken directly from BLM's national Planning Handbook, H-1601-1. According to the handbook, fire and fuels management is considered a resource and mineral and energy are categorized as a resource use. Regardless of the headings, impacts on to and from fire and fuels and mineral and energy are analyzed in the Proposed RMP/Final EIS.
Carbon County Recreation	Process and Procedures	4-1, Environmental Consequences: In analysis throughout this chapter soft wording is used to describe impacts. Words such as could, may, and not anticipated do not define impact. The words indicate that-impacts are not known, thus, impacts are not definitively disclosed.	NEPA documents attempt to disclose reasonably foreseeable impacts from proposed and reasonably foreseeable actions. The potential future impacts of planning decisions are not certain and are stated in the "future conditional verb tense", i.e. if an action is taken, the impact “would be”. The

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			analysis attempts to disclose the nature of the impacts and provide as much context as possible.
Carbon County Recreation	Recreation	2-74, 2.16, Special Recreation Permitting 5th Bullet: Requiring permits and fees will increase demand for recreational use on trust lands. The impacts of this proposal should be analyzed as to its effect on surrounding landowners. This has not been analyzed. BLM should contact SITLA prior to instituting a fee structure if the areas proposed for fees surround trust lands.	Please see general comment response #81. SITLA is one of many agencies BLM coordinates with as required by FLPMA, NEPA, and other laws and regulations. This requirement for consultation is common to all RMP alternatives.
Carbon County Recreation	Recreation	2-104, Management of Desolation Canyon, Turtle Canyon: These alternatives propose to manage areas as part of Desolation SRMA without analysis of need or disclosure of impacts.	Please see general comment response #107
Carbon County Recreation	Socioeconomics	The purpose of an EIS is to analyze and disclose the impacts of a proposed action. The more detailed comments on the draft and the over-all poor quality of the DEIS substantiates, the lack of such analysis and disclosure. In many cases errors or total omission of data prevents analysis by the reader and implies a lack of analysis on the part of the decision maker. The analysis of socio-economic impacts is totally inadequate. Although there is a feeble attempt to disclose socio-economics, the economic benefits of mineral to the tax base and revenues were omitted as was the impact on the local job market. The BLM has an obligation to consider impacts of the decisions on local economies. These omissions and error constitute a fatal flaw. The alternatives must be rewritten based on a rewrite of MSAs and in full consideration of law, regulation, and policy that govern their development.	See general comment response #132
Carbon County Recreation	Soil, Water and Riparian	2-26, 2.16, Soil Resources: Not all soils require mitigation to recover from disturbance. The need for mitigation depends on the soil type and the nature of the disturbance. Rewrite this section to address this. The draft fails to include a BLM document that addresses many of the issues related to surface disturbance and development that is Surface Operating Standards for Oil and Gas Exploration and Development. It contains standards for soil and reclamation related to such activities. If these standards no longer apply is should be so stated in the RMP; if they are still applicable they should be included here.	Please see general comment response #72
Carbon County Recreation	Soil, Water and Riparian	2-29, Bottom of Page, Alt A,B,C,D; Development of Recreation Facilities on 100 year flood plane: Here it provides that recreation facilities designed so as not to impede the function of the flood plain would be permitted. This is counter to Page ES-4 Mineral and Energy, 5th bullet, which proposes to provide consistency in mitigation and stipulations throughout the planning area. This provision demonstrates a clear bias for recreation. To eliminate bias surface disturbance for recreation it must comply to the same standards as other uses. The statement "facilities designed so as not to impede the function of the flood plan would be permitted" is reflective of adaptive management and better states the purpose for such restrictions, i.e. Protection of the function of the flood plain, than does the exception language. Rewrite Alternative D to read "allow no new surface disturbing activities within the 100 year flood plain, public water reserves, or 100 m (330 ft.) of riparian areas. Exception facilities designed so as not to impede the function of these areas would be permitted.	The reference to "the recreation exception" has not been carried forward into the Proposed RMP/Final EIS. The Proposed RMP provides that "Buffer zones of no new surface disturbance (excluding fencelines) would be required in areas equal to the 100-year floodplain or 100 meters (330 feet) on either side from the centerline, which ever is greater, along all perennial and intermittent streams, streams with perennial reaches, and riparian areas." Exception, modification, and waiver language for surface disturbance are provided in Appendix G of the Proposed RMP/Final EIS.
Carbon County Recreation	Soil, Water and Riparian	4-30, 1st Bullet, Assumptions: The assumption listed here is that substantial disturbances of soil, including compaction and loss of vegetation, would lead to an increase of water runoff, increased sedimentation, lower soil productivity, degradation of water quality, channel structure, and a decrease in overall health. The use of the word "substantial" is a gross overstatement of these impacts. Oil and gas development is usually listed as the major	Please see general comment response #72

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		contributor to the impact. Table 4-2 which lists an initial disturbance of 579 acres of surface disturbance per year on the Alternative D on the 2.5 million acres in the planning area you will find that these disturbances are only .0002 of the resource area. Using the total of 11,576 acres disturbed during the life of the plan and giving no credit for reclaimed disturbances that amount increases to only .0046. Given background erosion rates this amount would not be measurable. It is clear that the degree of impacts to soil, water, and riparian are grossly exaggerated. This statement and analysis must be rewritten to accurately state the degree of impact.	
Carbon County Recreation	Soil, Water and Riparian	4-53, Alternative A & D, Bottom of Page; Impact to Transportation and Motorized Access: The impact analysis wording here is not consistent with the alternative in the Matrix, Pg. 2-29. There it provides that exceptions may be authorized by A.O. if it can be shown that the project as mitigated eliminates the need for the restriction. Here it provides that allowance of construction within these areas would be authorized if protection of the wetland and riparian values is insured, emphasis added. The description of the excerption offered here is more inline with the methods and assumptions found at the top of Pg. 4-3 than that listed on Pg. 2-29. Here are standards or goals as the alternatives have none. Rewrite alternative to reflect wording here.	Please see general comment response #72
Carbon County Recreation	Soil, Water and Riparian	4-60, Alternative D, Impact to Soil, Water and Riparian: Here it provides that Pinyon-Juniper (P/J) treatments would provide significant benefits to soil, water, and vegetation. This statement over looks the fact that the preferred alternative only provides for limited treatment of P/J. Given the fact that P/J in the resource area greatly exceeds its historic range and that treatments will be limited, significant benefits will be limited to the areas treated, not the resource areas as a whole. Rewrite to accurately describe impacts. Here and in the Alternatives the benefits of reduction of P/J on watershed yields have been over looked and should be addressed. There are ACECs that will prevent such treatment thus decadent P/J and P/J outside its historical range will be protected. These impacts have not been analyzed or disclosed. In many of the ACECs, and other special designations, these and other treatments have been prohibited but the impact was not analyzed or disclosed.	Please see general comment response #72
Carbon County Recreation	Soil, Water and Riparian	4-148/4-149, Tables 4-3 to 4-7, Acres in the development area: These tables are presented to represent the impacts of VRMs on energy development. They fail to disclose the impacts on oil and gas development in high potential areas and only disclose impacts in developed areas. Rewrite to fully disclose the full impact of the proposed alternatives.	The analysis of impacts on oil and gas has been expanded in the Proposed RMP/Final EIS based on a revised RFD scenario. See general comment response #53.
Carbon County Recreation	Soil, Water and Riparian	Appendix 20 Last Page, Ground Water Protection Stipulations: Listed here are stipulations for riparian areas and wetlands. On the first page it makes it clear that these areas may or may not exist in the 100 year flood plan. In Appendix 16 which lists exceptions, modifications, and waivers the areas are not addressed. Having a separated section for related issues is confusing. The sections of Appendix 20 that addresses ground water stipulations should be moved to Chapter 16 and listed with the other types of stipulations. The balance should be placed at the end of Appendix 16 as an attachment. Wetlands: There should be some standard listed that would define a wet meadow. Not having a prescription that defines these areas prevents analysis of impacts.	Please see general comment response #72. Appendix G in the Proposed RMP/Final EIS describes stipulations, exceptions, modifications and waivers.
Carbon County Recreation	Special Status Species	4-150, 2nd Paragraph 1st Bullet, Significant Criteria: Here the DEIS provides that any surface disturbance and/or human activity in potential occupied or designated habitats for a federally listed species may be significant and require consultation with the USFWS. This is inconsistent with the requirement of the Endangered Species Act and Implementation regulations. The regulation provides that each federal agency shall confer with the service on any action which is likely to jeopardize the continued existence of any proposed species or result in the destruction or adverse modification of proposed critical habitat. It is clear that "any surface disturbance and/or human activity" would not trigger consultation, properly, the BLM should review proposed activities to determine if the impact will require consultation and consult on the ones that do. Using the team "any surface disturbance and/or human activity" would require consultation on all activities taking place on these lands and cause un-due	'The significance criteria have not been carried forward into the Proposed RMP/Final EIS. An analysis assumption has been included that states: The U.S. Fish and Wildlife Service would be consulted on any actions with the potential to affect federally listed species or designated critical habitat.

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		delays resulting in impact not analyzed here. Rewrite to be consistent to law and policy.	
Carbon County Recreation	Special Status Species	4-162, 4th Section Down, Impacts to Special Status: The APHIS MOU was not included in the DEIS preventing review and analysis. If the MOU does not contain specific provisions for predation on special status species the impact to special species must be analyzed and reported here. Predators have been identified as having major impacts on Sage-Grouse populations. Any inability to control predation on them is a serious impact and must be analyzed.	Please see general comment response #66
Carbon County Recreation	Transportation and Access	The DEIS fails to adequately address transportation. The document does not contain a current map of existing roads. The existence of a road, regardless of ownership, is critical to the analysis of other resources. (Example: comparison of road system to designate roads and trails.) The document fails to establish direction as to what standard new roads will be built and the level of maintenance required on existing and new roads. As an example, in a project for the development or expansion of an oil or gas field all roads are not subject to the same level of use. Thus, the standard to which a road is constructed a maintenance is not to be the same.	The Draft RMP/EIS and Proposed RMP/Final EIS contain a map of existing roads in the current inventory (Draft RMP/EIS map 2-54, and Proposed RMP/Final EIS Map 2-72). The inventory includes roads submitted to the BLM by Carbon and Emery County, routes extracted from AGRC maps, routes extracted by remote sensing, and routes submitted by various OHV, motorcycle and off road groups (all without regard to ownership). Roads and routes in the San Rafael Travel Plan area were not part of the original map since that data already exists in the San Rafael Motorized Route Designation Plan. Road construction standards are not a RMP decision. Use of “other roads” for travel, such as “oil field roads,” is subject to the established agreement between the land owner and the lessee regarding who and what may travel the road. Generally, such roads are expressly limited to oil field production and maintenance purposes and not for general public travel or access, hence a different construction standard.
Carbon County Recreation	Vegetation	2-3, 2.2.3, Add A Bullet: "Manage and restore the shrub-steppe and Great Basin Sagebrush ecosystems." Failure to add this bullet would indicate a lack of commitment of support for the Partners for Conservation and Development agreement and projects. In Alt. D on pg. 2-31 it addresses management but not restoration. Rewrite.	Please see general comment response #162
Carbon County Recreation	Vegetation	2-30, Bullet At Bottom Of Page, Offsite Mitigation: The sentence here is incomplete. It should be struck as the content of this and any additional bullets not shown are unknown. Additions made after the draft prevents adequate analysis and substantial comment.	The remainder of the sentence appears on the top of page 3-31, but a period to end the sentence is missing. The complete bullet in the DEIS is: "For off-site mitigation to compensate for surface disturbing impacts, use accepted habitat enhancement practices as designed by appropriate BLM staff in coordination with the Utah Division of Wildlife Resources (UDWR)." The off-site mitigation language has been changed and is included in the Proposed RMP/Final EIS in Table 2-3, Vegetation.

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Carbon County Recreation	Vegetation	4-448, Top of Alternative A,B,C,D; Impacts of Surface Disturbance: As written, it is implied that forage will be permanently reduced on 4,200 acres. Reclamation of pipelines, pads, and roadside often provide more forage than that produced prior to the disturbance. Wildlife and livestock often benefit from the increase in forage and runoff trapped along roads. Rewrite to consider these benefits.	Please see general comment response #163
Carbon County Recreation	Vegetation	4-559, Top of Page, Impacts to Vegetation Alternative A and D: Here again the draft goes beyond analysis of the preferred alternatives and offers analysis of another alternative. However useful this information may be in selection of the alternative (in this case it is not) the same presentations are not made in the analysis of impacts on uses such as mineral development. Example: If 223 miles of river was not designated WSR, X number of wells could be drilled.	Please see general comment response #163
Carbon County Recreation	Wild and Scenic Rivers	2-131, Next to Last Paragraph, Common To All: The wording here must be changed to reflect language in the Wild and Scenic River Act which provides for such protection. It should read, "line of site up to 1/4 miles".	The Wild and Scenic Rivers Act does not define the river area as “[line-of-sight] up to ¼ miles.” The Act does, however, define the river study area as a minimum of "that area measured within one-quarter mile from the ordinary height water mark on each side of the river" (Section 4(d)). Ultimately, boundaries of designated rivers are on average not to exceed "320 acres of land per mile measured from the ordinary high water mark on both sides of the river" (Section 3(d)) If this acreage were applied uniformly along the entire designated segment, it would equate to one-quarter of a mile on each side of the river.
Carbon County Recreation	Wild and Scenic Rivers	2-131, Last Paragraph, Common to All: Both the determination of eligibility and finding of suitability can indirectly affect adjudicated water rights should the holder wish to change the point of diversion of that right or transfer water to another basin or drainage. This impact should be noted and analyzed. After a determination of suitability is made there is no further analysis of the impact of a Federal Reserve water right. The Process and Criteria for Inter Agency Use titled Wild and Scenic River Review in the Sate of Utah, Page 2, provides the Purpose and Guidance for Determining Suitability. It states "The purpose of the suitability component is to determine whether eligible rivers are appropriate additions to the national system by considering trade-offs between corridor development and river protections". Further, it provides that "suitability considerations include the environmental and economic consequences of designation and the manageability of the river if designated". To determine economic consequences an analysis of the impact of a federal reserve right on diversions, river system compacts, adjudicated water, the restrictions on future impoundments and the prohibition on future development that could affect the quality or quantity, with respect to the classification etc., must be made. This analysis has not been made. Rewrite to fully disclose and analyze impacts.	Please see general comment responses #73 and #151
Carbon County Recreation	Wild and Scenic Rivers	2-131, Bottom of Page, Determination Of Potential Wild and Scenic Rivers: At the end of the paragraph it provides that specific management for each classification is outlined in Appendix 22. Appendix 22 is classification criteria no management. No such appendix is listed in the table of contents. Management is not outlined in Chapter 2, Page 2-19, Common To All.	The discrepancy regarding the reference to Appendix 22 has been corrected. Appendix C of the Proposed RMP/Final EIS explains the Wild and Scenic Rivers Study Process and findings. All management will be in accordance with the provisions of the selected Resource Management Plan.

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Carbon County Recreation	Wild and Scenic Rivers	4-556, Bottom of Page, Resources Impacts: Here impact analysis was completed with unknown or undisclosed management stipulations. The Chapter 2 Matrix states that "Specific management for each classification is outlined in Appendix 22". It is not. The stipulations are not listed in Chapter 2 Common To All. This section lists no assumption on which to base the analysis. These errors prevent analysis and disclosure of impacts.	The Final EIS has been changed to correct the discrepancy between the Chapter 2 reference to management in Appendix 22 and the actual contents of Appendix 22 in the Draft EIS, which presented criteria for applying tentative classifications. Appendix C of the Proposed RMP/Final EIS explains the Wild and Scenic Rivers Study Process.
Carbon County Recreation	Wilderness	1-12, 1.6.13, Wilderness Study Areas: At the end of this paragraph it provides that the RMP will set objectives for management of visual resources and OHVs in the WSAs and ISAs. Management of these resources is directed by the Interim Management Plan for these areas which is the management standard. Strike the last sentence of this paragraph.	'While the Interim Management Policy (IMP) contains direction for how WSAs should be managed, it does not make OHV and VRM designations. For example, the IMP notes that some lands under wilderness review may contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, these may include structures and primitive vehicle routes. There is nothing in the IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new impacts that would impair the area's wilderness suitability. Designation for OHV and VRM through land use planning is consistent with BLM policy as stated in the IMP (BLM H-8550-1) and planning guidance (BLM H-1601-1).
Carbon County Recreation	Wilderness	1-12, 1.6.14, Non WSA Lands With or Likely To Have Wilderness Characteristics: As written this section is misleading and not consistent with the settlement and directives related to it. It fails to address the settlement of Utah v. Norton. A brief description of the terms should be in the opening paragraph of this section. This would provide the reader an answer to why the BLM won't consider designations of new WSAs in the process.	Please see general comment response #146
Carbon County Recreation	Wilderness	2-103, Alt. B,C,D,, Management of San Rafael Swell if Released: The size of the area that would be NSO as proposed in Alt. B, C, and D prevents access to oil and gas (see previous discussion on this issue). In reality these areas are withdrawals and must be reported and analyzed as such. ROS is a management tool to inventory values not a tool to manage for non-impairment and drive closures. Values identified by the ROS should be compared and analyzed against other resources. In this case analysis on oil and gas development and locatable minerals that analysis has not been made. A portion of this area has considerable mineral potential and that potential has not been identified in the impact analysis. Lands are released from wilderness consideration because they don't meet wilderness criteria. Subsequently, these lands should not be managed as wilderness but should return to the multiple-use sustained yield standard. These alternatives proposed to manage areas as part of San Rafael Swell System SRMA without analysis of	Please see general comment responses #49,#50 and #112

Organization	Category	Comment	Response
		need or disclosure of impacts.	
Carbon County Recreation	Wilderness	4-472, All, Wilderness Study Areas: As written and analyzed this section appears to demonstrate a bias against multiple use and in favor of management for non-impairment.	Please see general comment response #113
Carbon County Recreation	Wilderness	4-472, Mid-Page, The Tavaputs Plateau: Here is one of the few proper acknowledgements in all of Chapter 4 that subject lands are located high mineral potential occurrence areas. It is interesting to note that it is used here to describe impacts to wilderness but is not used to analyze impacts to energy and minerals from special designation. The discussion in this paragraph is inappropriate here as it is analysis of impacts. It is not clear what wilderness characteristics they are referring to. If it is in wilderness the WSAs protections prevent such impact. If the reference is to lands not WSAs but with purported wilderness characteristics it should not be in this section. Strike this paragraph. Presentation here could be interpreted as biased.	Please see general comment responses #36 and #113
Carbon County Recreation	Wilderness	4-472, 1st paragraph, Method of Analysis: Here it provides that impact to resources and resource use was not addressed. On the Page 4-474 at the top it reasons that this analysis was made in the wilderness FEIS. This is a correct statement. However, this section goes on to discuss impacts to WSA from interim management VRMs, transportation and motorized access, plus a lengthy discussion of impact to wilderness characteristics. Again, WSAs are protected for such impact as acknowledged in the method analysis. In short, impacts to other resources were not analyzed because they were in the FEIS but impacts to wilderness characteristics were analyzed. This could be viewed as bias.	Please see general comment responses #113 and #123
Carbon County Recreation	Wilderness	4-472, Last Paragraph, Impacts that result in change of wilderness characteristics: Above it provides that analysis of impacts to other resources was not made because lands are managed under the IMP. The same should apply here.	Please see general comment response #113
Carbon County Recreation	Wilderness	4-476, Decisions: Here, and in Chapter 2, it provides that ROS primitive and semi-primitive non-motorized would be open to leasing and managed as part of the Desolation Canyon SRMA. However, a portion of this area is covered by the Range Creek ACEC which is closed to leasing. An analysis of the impacts of the release alternatives must be made and impacts fully disclosed. It requires extensive research of the RMP to determine the impacts of the proposed alternatives and they are not disclosed or analyzed here. Released lands are no longer managed as WSAs and their proposed management must be disclosed and analyzed.	Please see general comment response #112
Carbon County Recreation	Wilderness	4-477, Impacts To Wilderness Characteristics: See previous comments on wilderness characteristics. These are not WSAs but simply lands with characteristics associated with the concept of wilderness. Their protection should be addressed and analyzed in the appropriate sections elsewhere in this document. Their analysis here could appear to some as managing them as wilderness in violation of the wilderness settlement.	Please see general comment response #36 and #113
Carbon County Recreation	Wilderness	4-478, Release of Horseshoe Canyon: Here again a released WSA is proposed to be managed as part of SRMA. Map 2-44 through 2-46 indicates that this area is in a proposed ACEC which is not proposed in the alternative or the analysis. Rewrite sections or correct maps to reflect what is proposed and analyze and disclose impacts.	Please see general comment response #113
Carbon County Recreation	Wilderness	4-479, Impacts to Wilderness Characteristics: The analysis here implies no routes would be designated in this area, implying this area may be NSO. This adds to the possibility that an ACEC may somehow be proposed but omitted. (See above comment.)	Please see general comment responses #36 and #113
Carbon County Recreation	Wilderness	4-480/4-484, All, Land Likely to Have Wilderness Characteristics: See previous comments on this issue in Chapter 2. This section could be viewed by some as a violation of the wilderness settlement. The lands should be covered by the appropriate sections of this DEIS and the impacts to them addressed here.	Please see general comment responses #113 and #146

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Carbon County Recreation	Wilderness	4-483, Bottom of Page, Decision Background 2nd Paragraph: Here it states that "no inventory has been completed by the BLM to confirm the presence of the suggested values of the area has taken place." (Non-WSA lands with wilderness characteristics). This alone should be adequate reason to strike this entire section. Page 4-480 to 4-484 contains analysis on resources that have not been determined to exist.	Please see general comment responses #36, #113 and #116
Carbon County Recreation	Wilderness	1-12, 1.6.14, Non WSA Lands With or Likely To Have Wilderness Characteristics: "Or likely to have" should be struck from the title of this section. Neither the settlement nor IM 2003-274 or IM 2003-275 provides for the management of such land to preserve some or all of these values as presented in the first paragraph. In the last paragraph the reader is referred to 1M 2003-275, change one for a definition of wilderness characteristics. Here it is clearly stated that wilderness characteristics are features of land associated with the concept of wilderness. If one adheres to that definition here it is easier to understand land either has these characteristics or it doesn't. To properly establish how wilderness characteristics are to be addressed, the third paragraph should be moved up to become the first paragraph, as it establishes how and the extent to which wilderness characteristics will be addressed. This section clearly defines protections that may be applied but seems to ignore the requirements in IM 2003-275, Pg. 2 of 7 Policy/Action were it states "the BLM will involve the public in the planning process to determine the best mix of resource use and protection consistent with multiple-use and other criteria established in FLPMA and other applicable law, regulation, and policy." This section fails to accurately portray what wilderness characteristics are and misstates how they are to be addressed in this document. Rewrite this section.	Please see general comment responses #36, #113 and #116
Carbon County Recreation	Wilderness	VRM, ACEC, SRMA, ERMA, etc., cannot be used to manage BLM lands for wilderness characteristics or to non-impairment standards to the exclusion of all the other resource values.	Please see general comment responses #37, #141, #156
Carbon County Recreation	Wildlife and Fish	We support the elimination of mandatory 1:1 acre-for-acre off-site mitigation for any action that would result in surface disturbance to crucial value habitats. However, this statement is inconsistent with Appendix 8, Spatial and Seasonal Wildlife Conservation Measures, where it is stated that 1:1 off-site mitigation is required for mule deer/elk crucial winter habitat and Rocky Mountain and Desert bighorn sheep. Revision of Appendix 8 is necessary.	Please see general comment response #43
Carbon County Recreation	Wildlife and Fish	The RMP/EIS is silent concerning what could or would occur in the absence of off-site mitigation. However, we strongly object to wording such as "BLM would encourage willing partners to participate in off site mitigation strategies" because it could lead to "BLM arm-twisting" or bad public relations if companies would not volunteer this type of effort. It would be more appropriate to include wording such as "BLM and applicable land users would consider and evaluate off-site mitigation as one of multiple options to mitigate adverse impacts to crucial value habitats."	Please see general comment response #43
Carbon County Recreation	Wildlife and Fish	Special Status Species and fish and wildlife stipulation on surface disturbing activities: There are stipulations in Appendix 16 that are not listed in Appendix 8, in Chapter 2, or analyzed in Chapter 4. Example: Sage-Grouse nesting habitat. No alternatives were offered for the restrictions on nesting habitat. The section should be analyzed to determine if other such problems exist.	Please see general comment response #41
Carbon County Recreation	Wildlife and Fish	2-11, 2.7.7 last bullet, Sage-Grouse Plans: A provision should be added to this paragraph that provision of future local Sage-Grouse plans would be incorporated when it is finalized. The UDWR strategic management plan and national MOU on Sage-Grouse, both of which were developed with BLM participation, call for and support the development of local plans.	Please see general comment response #55
Carbon County Recreation	Wildlife and Fish	2-12, 2.7.8, Fish And Wildlife: The concept of seasonal closures should be revised. Seasonal closures should allow for waivers in some circumstances such as when animals are not present or where weather, topography or the nature of the disturbance would substantially reduce the disturbance of the animals. There is a school of	Please see general comment responses #41 and #42

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		thought that says total seasonal closures can actually do more damage than good because it concentrates activity to certain locations or time periods. Appendix 8 does not show closures for Alternative D although they can be ascertained from the appendix for stipulations.	
Carbon County Recreation	Wildlife and Fish	2-40, Goals Top of Page, Use Spatial And Seasonal Conservation Measures: See previous comment on Pg. 2-12, Section 2.7.8. There are no provisions for modifications of these closures here or in Appendix 8. This is not consistent good science or directions or spirit of IM 2003-233 which directs that unnecessary stipulation should not be used and direct the use of performance based on stipulation that support adaptive management.	Please see general comment response #41
Carbon County Recreation	Wildlife and Fish	2-93, Alt. D Bottom of Page, Linear Rows Outside Designated Corridors: To have a one mile barrier around sage-grouse leks as an avoidance area is unreasonable as the impacts could be easily mitigated if needed. This requirement is contrary to the state Sage-Grouse Recovery Plan to which the BLM is a party.	Please see general comment response #55
Carbon County Recreation	Wildlife and Fish	4-155, Fish and Wildlife: This section fails to address the cumulative impacts of closures. The DEIS does not show fawning and calving areas for deer and elk. It is not possible to determine overlaps in closures. The Appendix and Maps should show these areas clearly but they do not. Given the material at hand, neither the drafter nor the reader can determine impacts. Any overlaps in closures should be listed to assist in analysis. Rewrite this section and analyze and disclose impact and cumulative impact of this section.	Maps 3-10 and 3-11 display crucial, high value and substantial spring/summer/winter/fall/yearlong habitat for deer and elk. Fawning and calving areas are included within these categories. Aspen mountain browse communities and areas of aspen blow down are identified as key calving and fawning areas in Chapters 3 and 4 of the Proposed RMP/Final EIS. The impacts of restrictions to protect wildlife are analyzed in Chapter 4.
Carbon County Recreation	Wildlife and Fish	4-159, 2nd section, Impacts to Fish and Wildlife: Add to this section, "Seasonal restrictions placed on oil and gas exploration could impact fish and wildlife by compressing such activities into specific time periods". Seasonal restrictions increase the level of activity into short time frames, thus, increasing the intensity of activities.	Seasonal restrictions placed on oil and gas exploration do not always result in an increased intensity of oil and gas activity over what would occur with year-round drilling. The EIS states that timing limitations would minimize stress to wildlife by limiting construction, drilling, and other activities, which would generally be the case.
Carbon Emery Motorcycles Association	OHV Route Identification	To complicate the implementation of this new management plan is the lack of route designations. How can you put these management layers in place without first having a travel plan? No matter how well intended, this plan would have undesirable results and even if all existing routes were left open, eventually many important routes would be closed because of a pervious imposed restriction. This is like having the cart before the horse, isn't it? From our point of view the soonest a reasonable travel plan could be set in place is two to three years. There should be serious discussion of postponing any changes without a travel plan to present. The preferred alterative "D" for OHV route designations is a good example of either a major oversight, total lack of understanding or a bias of the needs of the OHV community. Not a single trail or road that was submitted to the BLM by off road user groups was shown on the map. This is reminiscent of the trails that where submitted during the San Rafael Travel Plan process, they were totally left off the map and out of the discussion even though many promises were made about their inclusion... The alterative "D" for OHV route designations included around 150 miles of paved roads. Apparently the BLM does not understand it is against the law to ride such vehicles on these types of roads. If the BLM would employ a recreation specialist that has a back ground in motorized off road recreation and was concerned about their continued use, perhaps problems like these could be avoided. With the increasing use of OHVs perhaps it would be appropriate, to suggest, the BLM add a whole new department dealing specifically with off road vehicles usage... G2- The area east of Hwy 24, north of the Emery County line, south of the San Rafael	See general comment response #15, #19, #20 #31, and #78

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		River and west of the county road which parallels the Green River should be designed as an open riding area and the small closed areas within be removed. See map G-2... A2- There are three routes in the Behind the Reef Road area that have been adopted by three different motorized user groups and have signed agreements with the BLM to help in their maintenance and monitoring. These routes pass through ROS class Semi-Primitive Non-Motorized. We feel this area should be changed to ROS Semi-Primitive Motorized. See Map A-1... A3- This spring about half of Behind the Reef Road was graded by mistake. Unfortunately it destroyed much of the riding valve of this trail. To mitigate some of the losses we are asking the BLM to reopen the Bell Mining Loop. See Map A-2 A4- The route from Ramp Canyon to the county road which passes the staging area for Quandary Canyon is limited to vehicles under 52" width. It is used by a large number of hikers and should be reopened to full sized vehicles. There is not room at the county road for parking. See Map A-3... A6- We are asking that the old county road to Hidden Splendor Mine be reopened. It would break up the long 30 mile ride back to Temple Mountain after ridding the Behind the Reef Road, on an ATV. This route would also eliminate most of the tight turns on the many county road in this area and the potential for head on encounters with full sized vehicles. See Map A-5 A-7 When the San Rafael Travel Plan was put into place an important link was left out. There is a route from Temple Mountain to I-70 between the Reef and Hwy 24. Most all of this route is presently open other than a five mile segment, two of which are part of the old Hanksville road. If this route was reopened a large loop could again be utilized by ATV's. All five miles of this route are old roads. See Map A-6 A8- We are asking that some of the trails in the Temple Mountain Trail System be reopened to other vehicles than motorcycles. Allow vehicles under 52" to use the Blue, Green, Orange and Victor trails. Most of these trails are old roads and could easily accommodate ATV's. Reopen Lone Man and Home Base Link routes to full sized vehicles. Reopen the Purple Trail to motorcycles. These changes would greatly enhance this trail system and would add to the continuity and flow of the users. See Map A-7 A8- Designate a trail system in the Rods Valley, Family Butte area for all vehicles. There is a number of old mining roads already open and we feel that making this type of designation would take some of the pressure off of the Sids Mountain Trails. No map... B2- The road in Lower Range Creek should be reopened too within one quarter mile of the Green River instead of the now two and one half miles. This would allow a much shorter and bearable hike but yet keep vehicles far enough from the river that their not noticeable. The claim that Lower Creek is a trophy trout stream is not true and that the numerous stream crossing would destroy this is totally unfounded. During dry years there is no or little water flow to sustain any type of trophy fishery and any type of habitat that could possibility be established in wet years would unavoidably be flushed out during the major floods that routinely occur. Conflicts in the past between users were usually one sided and point to a possessive attitude of the groups floating the river. A permit would be required for motorized travel on this route. See Map B-2 B3- The area known to the Price BLM as the doughnut hole (Big Horn Mountain) is full of old roads. It has not been included in the Desolation Canyon WSA because of that very reason. Many of these roads were built in 1940s and 1950s. In the 1970s some of the routes were enlarged for oil and gas exploration. When the oil companies were finished they completely reclaimed the roads thus restricting access to whole area (they should have reclaimed the enlarged roads back to their original size). This is an open area and is being used for motorcycle riding. We are proposing that this area be kept open with some restriction. It would be a permit area and would require a fee and an authorized guide. This area would be limited to a set number of riders and seasonal closures would be set. All motorcycles riding in the area would be required to meet noise limits. The details would need to be worked out. See Map B-3 B4- The area along Hwy 6 from I-70 to Wellington which would also include Cedar Mountain has been used as a motorized recreation area for many years. Over the years a number of motorcycle races have taken place in the Chimney rock, Lost Springs, Summerville and mounds areas. There are numerous routes, most which follow old roads some that do not. All of the route should be left	

Organization	Category	Comment	Response
		open until they can be designated. In fact all existing routes in the Price section of the BLM's Management area should be left open until their status is determined. No Map	
Carbon Emery Motorcycles Association	Process and Procedures	It appears that sections of the plan were left out; hopefully this was just an oversight. Whether an oversight by the authors or more concerning, a bias in its drafting, major changes are needed before this plan should be adopted... The changes the BLM are proposing in any of the alterative are unacceptable they amount to a wholesale movement away from current usages...	Please see general comment response #123
Carbon Emery Motorcycles Association	Process and Procedures	We are not totally opposed to the multiple layered approached of management (ACEC, ROS, VRM, T&E, ETC.) but the complexities of understanding how they will interact with each other might not be understood.	Please see general comment response #37
Carbon Emery Motorcycles Association	Process and Procedures	Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain similar proposals. Through the use of many overlapping and confusing management "layers", the BLM will attempt to require the public to comply with these restrictions. All alternatives contained in the document represent an unprecedented change from current BLM management and until a reasonable plan is presented no changes should be made...	Please see general comment response #37
Carbon Emery Motorcycles Association	Recreation	The recreation management in the DRMP's Preferred Alternative which plans to impose group size limits and camping restrictions is totally unacceptable to us. There simply is no need for these kinds of restrictions on recreational use... G1- A number of large non-harden camp sites, able to handle big groups which already are established, should be kept in place and shown on a map. These areas would not require any permit for groups under 50 people. For group activities larger than 50 people permits would be required and a small fee but no more than a two week waiting period to obtain one. The BLM is proposing only six large group camp sites we feel that number should be increased to around 50. These camp sites already are being used, like, Buckhorn Reservoir, Lucky Flats, Chimney Rock, Mounds Area, Woodside, Clark Valley, Gordon Creek near the Wild Cat load out, Coon Spring, Tomsich Butte, etc. No Map.. B1- We are proposing a motorized recreational park be established between the old Buckmaster Mining area and Tidwell Draw, of about 3000 to 5000 acres. This area would be open to all vehicles with trails and routes designed for the different machines. This area could be used for competition events such as "Rock Crawling" for full sized vehicles and "Trials" for motorcycles and ATV's. Also non-motorized bicycle events could be held here. This would be a major undertaking and requiring cooperation from the BLM, Emery County, Utah State Parks, DOGM, Green River City, Grazing Permit holders and the User groups. This area has seen a great deal of mining activity over the years and would need some reclamation work to close old mine shafts. Green River City would receive economical benefits from such a park. The BLM has proposed this area as an ACEC for historical mining but we feel that the historical valve could be easily mitigated. A feasibility study would be appropriate including the aforementioned groups. Funding could be pursued through a number of sources. See Map B-1.	Please see general comment responses #79 and #81
Carbon Emery Motorcycles Association	Wilderness	We are concerned about non Wilderness Study Area lands with or likely to have wilderness characteristic. These lands were inventoried for resources associated with wilderness character but not for other resource values. BLM is required to inventory other resource values other than those associated with wilderness character. The BLM has failed to incorporate these other resource uses and values into their inventory or their analysis in the DRMP/DEIS. The document was not clear on how the BLM would propose management of these areas but it appears like some type of defacto Wilderness Study Areas are being created.	Please see general comment responses #36 and #108
Carbon Emery Motorcycles Association	Wilderness	We find these wilderness definitions vague and open to the bias of those interpreting them. Wilderness Characteristics. Features of the land associated with the concept of wilderness that may be considered in land use planning when BLM determines that those characteristics are reasonably present, of sufficient value	See general comment responses #36 and #114. The concept and definition of wilderness and wilderness characteristics is codified in the 1964

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		(condition, uniqueness, relevance, importance) and need (trend, risk), and are practical to manage. Naturalness. Lands and resources exhibit a high degree of naturalness when affected primarily by the forces of nature and where the imprint of human activity is substantially unnoticeable. BLM has authority to inventory, assess, and/or monitor the attributes of the lands and resources on public lands, which, taken together, are an indication of an area's naturalness. These attributes may include the presence or absence of roads and trails, fences and other improvements; the nature and extent of landscape modifications; the presence of native vegetation communities; and the connectivity of habitats.	Wilderness Act. As such, the glossary definition is in compliance with both IM-2003-275 as well as Utah v. Norton settlement that states "the term 'wilderness character' is used to refer to the necessary collective characteristics or features of wilderness as defined in the Wilderness Act of 1964" (footnote 1, page 2).
Castle Country King Crawlers	OHV Route Identification	We as a club do not want nor do we believe that more restrictions [Group size] are needed! The current restrictions have been in place for some time and those that know of them have accepted them.... We can not plan on how many people and exactly what activities we will be doing especially that far in advance.	Please see general comment response #81
Castle Country OHV Association	OHV Route Identification	To complicate the implementation of this new management plan is the lack of route designations. How can you put these management layers in place without first having a travel plan? No matter how well intended, this plan would have undesirable results and even if all existing routes were left open, eventually many important routes would be closed because of a pervious imposed restriction. This is like having the cart before the horse, isn't it? From our point of view the soonest a reasonable travel plan could be set in place is two to three years. There should be serious discussion of postponing any changes without a travel plan to present. The preferred alterative "D" for OHV route designations is a good example of either a major oversight, total lack of understanding or a bias of the needs of the OHV community. Not a single trail or road that was submitted to the BLM by off road user groups was shown on the map. This is reminiscent of the trails that where submitted during the San Rafael Travel Plan process, they were totally left off the map and out of the discussion even though many promises were made about their inclusion... The alterative "D" for OHV route designations included around 150 miles of paved roads. Apparently the BLM does not understand it is against the law to ride such vehicles on these types of roads. If the BLM would employ a recreation specialist that has a back ground in motorized off road recreation and was concerned about their continued use, perhaps problems like these could be avoided. With the increasing use of OHVs perhaps it would be appropriate, to suggest, the BLM add a whole new department dealing specifically with off road vehicles usage... G2- The area east of Hwy 24, north of the Emery County line, south of the San Rafael River and west of the county road which parallels the Green River should be designed as an open riding area and the small closed areas within be removed. See map G-2... A2- There are three routes in the Behind the Reef Road area that have been adopted by three different motorized user groups and have signed agreements with the BLM to help in their maintenance and monitoring. These routes pass through ROS class Semi-Primitive Non-Motorized. We feel this area should be changed to ROS Semi-Primitive Motorized. See Map A-1... A3- This spring about half of Behind the Reef Road was graded by mistake. Unfortunately it destroyed much of the riding valve of this trail. To mitigate some of the losses we are asking the BLM to reopen the Bell Mining Loop. See Map A-2 A4- The route from Ramp Canyon to the county road which passes the staging area for Quandary Canyon is limited to vehicles under 52" width. It is used by a large number of hikers and should be reopened to full sized vehicles. There is not room at the county road for parking. See Map A-3... A6- We are asking that the old county road to Hidden Splendor Mine be reopened. It would break up the long 30 mile ride back to Temple Mountain after ridding the Behind the Reef Road, on an ATV. This route would also eliminate most of the tight turns on the many county road in this area and the potential for head on encounters with full sized vehicles. See Map A-5 A-7 When the San Rafael Travel Plan was put into place an important link was left out. There is a route from Temple Mountain to I-70 between the Reef and Hwy 24. Most all of this route is presently open other than a five mile segment, two of which are part of the old Hanksville road. If this route was reopened a large loop could again be utilized by ATV's. All five miles of this route are old roads. See Map A-6 A8- We are asking that some of the trails	See general comment responses #10, #19, #20, #78 and #79. Blue Ribbon Fisheries in the PFO include Scofield, Reservoir, Huntington Creeks, and Fish Creek, below Scofield through the confluence with the White River, forming the Price River, downstream to the ghosttown of Royal.

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		in the Temple Mountain Trail System be reopened to other vehicles than motorcycles. Allow vehicles under 52" to use the Blue, Green, Orange and Victor trails. Most of these trails are old roads and could easily accommodate ATV's. Reopen Lone Man and Home Base Link routes to full sized vehicles. Reopen the Purple Trail to motorcycles. These changes would greatly enhance this trail system and would add to the continuity and flow of the users. See Map A-7 A8- Designate a trail system in the Rods Valley, Family Butte area for all vehicles. There is a number of old mining roads already open and we feel that making this type of designation would take some of the pressure off of the Sids Mountain Trails. No map... B2- The road in Lower Range Creek should be reopened too within one quarter mile of the Green River instead of the now two and one half miles. This would allow a much shorter and bearable hike but yet keep vehicles far enough from the river that their not noticeable. The claim that Lower Creek is a trophy trout stream is not true and that the numerous stream crossing would destroy this is totally unfounded. During dry years there is no or little water flow to sustain any type of trophy fishery and any type of habitat that could possibility be established in wet years would unavoidably be flushed out during the major floods that routinely occur. Conflicts in the past between users were usually one sided and point to a possessive attitude of the groups floating the river. A permit would be required for motorized travel on this route. See Map B-2 B3- The area known to the Price BLM as the doughnut hole (Big Horn Mountain) is full of old roads. It has not been included in the Desolation Canyon WSA because of that very reason. Many of these roads were built in 1940s and 1950s. In the 1970s some of the routes were enlarged for oil and gas exploration. When the oil companies were finished they completely reclaimed the roads thus restricting access to whole area (they should have reclaimed the enlarged roads back to their original size). This is an open area and is being used for motorcycle riding. We are proposing that this area be kept open with some restriction. It would be a permit area and would require a fee and an authorized guide. This area would be limited to a set number of riders and seasonal closures would be set. All motorcycles riding in the area would be required to meet noise limits. The details would need to be worked out. See Map B-3 B4- The area along Hwy 6 from I-70 to Wellington which would also include Cedar Mountain has been used as a motorized recreation area for many years. Over the years a number of motorcycle races have taken place in the Chimney rock, Lost Springs, Summerville and mounds areas. There are numerous routes, most which follow old roads some that do not. All of the route should be left open until they can be designated. In fact all existing routes in the Price section of the BLM's Management area should be left open until their status is determined. No Map	
Castle Country OHV Association	Process and Procedures	The changes the BLM is proposing in any of the alterative are unacceptable; they amount to a wholesale movement away from currants usages. Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain similar proposals.	Please see general comment response #2
Castle Country OHV Association	Process and Procedures	We are not totally opposed to the multiple layered approached of management (ACEC, ROS, VRM, T&E, ETC.) but the complexities of understanding how they will interact with each other might not be understood.	Please see general comment response #37
Castle Country OHV Association	Process and Procedures	Through the use of many overlapping and confusing management "layers", the BLM will attempt to require the public to comply with these restrictions. All alternatives contained in the document represent an unprecedented change from current BLM management and until a reasonable plan is presented no changes should be made.	Please see general comment response #37
Castle Country OHV Association	Recreation	The recreation management in the DRMP's Preferred Alternative which plans to impose group size limits and camping restrictions is totally unacceptable to us. There simply is no need for these kinds of restrictions on recreational use... G1- A number of large non-harden camp sites, able to handle big groups which already are established, should be kept in place and shown on a map. These areas would not require any permit for groups under 50 people. For group activities larger than 50 people permits would be required and a small fee but no	Please see general comment responses #81 and #93

Organization	Category	Comment	Response
		more than a two week waiting period to obtain one. The BLM is proposing only six large group camp sites we feel that number should be increased to around 50. These camp sites already are being used, like, Buckhorn Reservoir, Lucky Flats, Chimney Rock, Mounds Area, Woodside, Clark Valley, Gordon Creek near the Wild Cat load out, Coon Spring, Tomsich Butte, etc. No Map.. B1- We are proposing a motorized recreational park be established between the old Buckmaster Mining area and Tidwell Draw, of about 3000 to 5000 acres. This area would be open to all vehicles with trails and routes designed for the different machines. This area could be used for competition events such as “Rock Crawling” for full sized vehicles and “Trials” for motorcycles and ATV’s. Also non-motorized bicycle events could be held here. This would be a major undertaking and requiring cooperation from the BLM, Emery County, Utah State Parks, DOGM, Green River City, Grazing Permit holders and the User groups. This area has seen a great deal of mining activity over the years and would need some reclamation work to close old mine shafts. Green River City would receive economical benefits from such a park. The BLM has proposed this area as an ACEC for historical mining but we feel that the historical valve could be easily mitigated. A feasibility study would be appropriate including the afore mentioned groups. Funding could be pursued through a number of sources. See Map B-1.	
Castle Country OHV Association	Wilderness	We are concerned about non Wilderness Study Area lands with or likely to have wilderness characteristic. These lands were inventoried for resources associated with wilderness character but not for other resource values. BLM is required to inventory other resource values other than those associated with wilderness character. The BLM has failed to incorporate these other resource uses and values into their inventory or their analysis in the DRMP/DEIS. The document was not clear on how the BLM would propose management of these areas but it appears like some type of defacto Wilderness Study Areas are being created.	Please see general comment response #108 and #116
City of Castle Dale	Wild and Scenic Rivers	It is a mistake to have our rivers represent vestiges of primitive America. One argument is that once a river has been designated a "Wild and Scenic River" flow limits should be imposed and maintained. We tend to forget, the reason we have continual flow year-round is that we have impound structures that control the flow storing water, so that flow can be minimal during dry periods. If we did not have such impound structures, a great many streams and rivers would be dry in late summer early fall. If minimal stream flows were to be maintained, where would this water come from in August, September, and October? Water rights are over appropriated in water ways along the Wasatch Plateau. During these months, Castle Dale and other communities do not always have the water resources necessary to sustain current population needs. Any addition of water to Cottonwood Creek to maintain minimal flow levels would take precious water resources that are already allocated. This would have a great socioeconomic affect on the community of Castle Dale.	Please see general comment responses #86, #132, #150 and #151
City of Castle Dale	Wild and Scenic Rivers	The greatest concern of our community is the Wild and Scenic Rivers Act that has become the major focus of this RMP. Castle Dale as other communities along the western edge of the San Rafael Swell depend upon water received annually in the Wasatch Plateau. There are no groundwater resources available to these communities. All water available for culinary use is a product of surface flow. We are therefore greatly concerned about the designation of Wild and Scenic Rivers and the consequences of supporting such designations. The future results of such designations have the potential to restrict growth in our communities, prohibit future economic growth, and even cause drastic reductions in the economy we now enjoy.	Please see general comment responses #132 and #150
City of Castle Dale	Wild and Scenic Rivers	Castle Dale is concerned about the science and methodology used to determine which rivers were selected as candidates. One example is the South Coal Wash. The Wild and Scenic Rivers Act section 2 (b) states that "A wild, scenic, or recreational river area eligible to be included in the system is a free-flowing stream...". There is no free-flowing water in the South Coal Wash. It does not appear to meet the requirements set forth by the law.	Please see general comment response #88

Organization	Category	Comment	Response
Colorado River and Trail Expeditions	Recreation	Colorado River and Trail Expeditions, Inc. strongly opposes Alternative D concerning motorized boating within Desolation Canyon... 4 stroke engines are potentially more polluting than the 2 strokes in the instance of a boat accident (i.e. capsizing)... Finely tuned 2 stroke motors should be allowed to run out their useful life... The state and EPA carefully regulate the types of motors that are manufactured and used. We feel their standards are sufficient to determine motor use and further BLM stipulations are not necessary... We should be allowed to operate with motors when the Green River is above 5000 cfs. Banning the use of motors at higher river levels would effect our operations for special population trips, shorter trips, specialty trips, and clean-up trips... Limiting the number of motor boats to 90 per year may not be viable. In summary, Colorado River and trail Expeditions opposes Alternative D as it applies to motorized use. We are in favor of the "No Action" alternative.	Please see general comment response #34
CONSOL	Minerals and Energy Resources	The objective set forth in Section 2.65 on page 2-7, Alternative D appears to be worded differently than it appears on page ES-7 of the Executive Summary. On page 2-7, mineral development potential is maximized in areas with the “highest potential for recreation development”. Whereas in the Executive summary, mineral development potential is maximized in areas with the “highest potential for development”; the word recreation is not included. It appears that the two objectives, as stated, differ significantly.	The reference to "highest potential for recreation was in error. The language, now in section 2.2.6 of the Proposed RMP/Final EIS has been corrected to match the wording in the Executive Summary.
CONSOL	Minerals and Energy Resources	In Section 3.3.5.2 (page 3-53), coal is addressed as a leasable mineral and Map 2-23 is referenced to illustrate coal deposits. The correct map reference is Map 3-19. This same map is referenced as Map 3-24 on pages 3-54 and 3-55 within the same section. Various other maps within Section 3 are incorrectly referenced.	The map numbers and references have been updated and corrected in the Proposed RMP/Final EIS. Federal coal leases are shown on Map 3-24 and Known Coal Resources and Recovery Areas are shown on Map 3-25.
CONSOL	Minerals and Energy Resources	On page 3-53 under the Coal heading, the location of the Coal Report is referenced as Appendix 27. The correct location for that report is Appendix 25.	The correct reference to the Coal Report in the Draft RMP/EIS is Appendix 25. However, the Coal Report has not been included in it's entirety in the Proposed RMP/Final EIS. Appendix N of the final document presents unsuitability for coal mining on Federal lands in the Price management area.
CORVA	OHV Route Identification	I am a member of California Off-Road Vehicle Association (CORVA) and a contributing writer to many magazines supportive of multiple use and keeping public lands open to the public rather than from the public... the BLM must accurately disclose all changes that each alternative may make to the San Rafael Route designation Plan... The BLM should stick with the proven 50 vehicle limit and not impose National Park Style management on public lands... The BLM maps must be updated to accurately portray the OHV designations outlined in each alternative... How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use? I adamantly oppose all the management 'layers' outlined in the draft plan. Popular OHV Trail Systems must remain open. All of the Chimney Rock/Summerville and Humbug trail systems should be left open. I request that you designate links to the Arapeen Trail System. Please keep all existing roads and trails open for vehicle use.	Please see general comment responses #10, #19, #31, #37 and #78
Desert Survivors	Minerals and Energy Resources	Yet the Resource Management Plan recommends opening up most of these areas to oil and gas development. Your role as stewards of these wilderness quality lands is very important, and every effort should be made to spare them from the damaging footprint of drill pads, roads, and waste pits needed to support energy development projects.	Please see general comment responses #36 and #101
Desert Survivors	Minerals and Energy Resources	The BLM has established that more than a million acres of these lands qualify for federal designation as wilderness. Yet the Resource Management Plan recommends opening up most of these areas to oil and gas development. Your role as stewards of these wilderness quality lands is very important, and every effort should	Please see general comment responses #36 and #101

Organization	Category	Comment	Response
		be made to spare them from the damaging footprint of drill pads, roads, and waste pits needed to support energy development projects. Your plan in its current form would sacrifice the long-term health of these ecologically sensitive areas for short-term gain, and such gains are highly speculative in the case of oil exploration.	
Desert Survivors	OHV Route Identification	However, areas that have wilderness characteristics, such as the summit trail on Book Cliffs, should not be opened to off-road vehicle access. We recommend that you modify the plan to protect such areas from the scars of ORV use, as well as develop provisions for effective enforcement.	Please see general comment response #19
Desert Survivors	OHV Route Identification	Off-road vehicles continue to be a significant threat to our public lands, especially when illegal routes are created through Wilderness Study Areas. We support your proposal to designate specific trails for off-road vehicles. However, areas that have wilderness characteristics, such as the summit trail on Book Cliffs, should not be opened to off-road vehicle access. We recommend that you modify the plan to protect such areas from the scars of ORV use, as well as develop provisions for effective enforcement	Please see general comment responses #15, #19 and#36
Dolar Energy, L.L.C.	Lands and Realty	Under Alternatives A,B, and D, as described on page 4-397, pipelines with a diameter greater than 16 inches would need to be placed in either existing corridors or corridors that will be designated in the future. Using a pipeline size of 16 inches is arbitrary and capricious without any supporting documentation as to why this particular diameter or, the DEIS/RMP also states that additional corridors would be designated subject to physical barriers and sensitive resource values. If and when these ROW corridors would be selected in the future, we recommend that industry representatives be included in any decision process concerning the location of the corridors.	The level of surface disturbance associated with pipelines greater than 16 inches is such that more intensive management (i.e., restricted to designated ROW corridors) is required to ensure the protection of other resource values within the planning area. The smallest diameter for a transmission or sales line is usually 16 inches. This type of line would commonly be looped at some point following its construction. That process would require dedicated space in which to construct the loop line. The need for dedicated space would require that the original transmission or sales line be placed in a corridor. A 16-inch line, however, would not always be a transmission or sales line. In an area with a large number of wells, a 16-inch line could also be used for a lateral gathering line. In that case, inclusion in a corridor would not be necessary. Smaller pipelines can be constructed without creating surface disturbance that is inconsistent with the goals and objectives of other resources. This determination was based on past field experience and best professional judgment of BLM resource specialists. The ROW corridors will be selected in accordance with BLM Manual 2801.11 and 2801.12.
Dolar Energy, L.L.C.	Minerals and Energy Resources	The Price Field Office manages an area that has seen tremendous oil and gas development over the past decade, and there is no reason to believe this trend will diminish in the future. The region is flush with potential gas reserves, and the RMP should be prepared for 2,000-5,000 additional locations. New development of this important resource can only occur if agencies such as the Price Field Office recognize the importance of allowing reasonable access to natural gas reserves, and plans for it accordingly.	Please see general comment response #18

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		A primary concern of the DEIS is the lack of a basic foundation for making future decisions according to BLM's 1601 Planning Manual. The land use planning process is the key tool used to protect resources and designate uses on Federal lands managed by the BLM. As such, planning has been deemed critical to ensuring a coordinated, consistent approach to managing these lands for multiple use, while preserving natural resources and habitats for wildlife and species.	
Dolar Energy, L.L.C.	Minerals and Energy Resources	In the DEIS/RMP, BLM's stated intent is to recognize valid existing lease rights. Additionally, BLM policy as embodied in IM 92-67 instructs that mitigation is required to prevent unnecessary and undue degradation under FLPMA is within the terms of the lease. However, the standard for determining what constitutes unnecessary and undue degradation under FLPMA is within the terms of the lease. However, the standard for determining what constitutes unnecessary and undue degradation must also acknowledge that there is also "necessary and due degradation." Specifically, it is stated that if mitigation "would render a proposed operation uneconomic or technically infeasible so that a prudent operator would not proceed, such degradation may also be considered necessary for the management of the oil and gas resource." Since this policy appears to have been ignored by BLM when assembling the draft RMP and EIS, a new look at the alternatives is necessary and a new alternative that carefully addresses this issue is necessary.	Even with the most effective, state-of-the-art onsite mitigation, oil, gas, geothermal and energy right-of-way authorizations can result in impacts to the environment. A finding on unnecessary or undue degradation of the environment is made on the basis of analysis of site-specific or implementation level decisions and is case specific. Therefore, an additional alternative to consider unnecessary or undue degradation as the part of the RMP is not appropriate.
Dolar Energy, L.L.C.	Minerals and Energy Resources	The number of allowable wells per year is a highly significant conclusion of the RMP/EIS and represents a regulatory ceiling of 1,540 wells as described on page 4-4 of the RMP/EIS, "these numbers represent allowable development under each alternative and do not represent actual wells that would be drilled". The RMP/EIS states on page 1-11 "The RMP will ensure that minerals management issues, opportunities, and potential impacts will be addressed at an appropriate regional scale and will consider the following: Updated RFD scenarios for mineral development to be updated on a regional scale". In spite of the above statement, no documentation is explicitly presented in the RMP/EIS explaining how the RFD well numbers were developed other than to assume it is essentially based upon drilling activity that has occurred to date, 1,402 wells. According to BLM's policy under IM 2004-89 RFD is to be unconstrained by restrictions. That a total of only 1,540 wells were analyzed in the Draft Plan EIS is insufficient because IM 2004-089 specifies. The fact that the total number of wells in an area may exceed the total number of wells projected in the selected alternative does not automatically mean that a supplement to the NEPA document or a revision or automatically mean that a supplement to the NEPA document or a revision or amendment to the RMP is necessary. It is possible that exceeding the predicted level of environmental effects. Mitigation of environmental effects through successful reclamation, clustering wells on shared well locations, and minimizing pad and road construction can prevent the level of impacts from substantially exceeding the impacts analyzed in the original RMP/EIS or other NEPA documentation." The DEIS' statement that it would impose a "ceiling" of well numbers conflicts with BLM policy and must be changed to reflect the direction contained in IM 2004-089. In the DEIS/RMP, the BLM's stated intent is to recognize valid existing lease rights. However, Alternative D, the BLM's proposed Alternative, appears to follow IM 92-67 which does not allow "unnecessary degradation" however the policy also provides if mitigation "would render a proposed operation uneconomic or technically infeasible so that a prudent operator would not proceed, such degradation may also be considered necessary for the management of the oil and gas resource".	Please see general comment response #53
Dolar Energy, L.L.C.	Minerals and Energy Resources	Under Actions Common to All Alternatives at 2.8.5, Minerals and Energy Development, BLM indicates it will, "Acknowledge future development for coal resources in areas where coal bed natural gas development is taking place." On page 2-98, it states that "BLM would identify priority energy resource in conflict areas to promote safe	Please see general comment response #122

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		and efficient extraction of energy resources" and that "BLM would require dual resources" leasing and development in the same areas." What process BLM will use to "identify the priority energy resource in conflict areas" is not defined in the RMP. A policy needs to be formulated with both the coal and natural gas industries' involvement for dual development and should be incorporated in the preferred Alternative.	
Dolar Energy, L.L.C.	Minerals and Energy Resources	BLM claims in Appendix 23 to acknowledge the Presidents National Energy Policy which directs BLM to examine land status and lease stipulation impediments to federal oil and gas leasing, and review and modify those where opportunities sexist (consistent with the law, good environmental practice and balanced use of other (resources). While this information is relevant, BLM has clearly missed the intent of Instruction Memorandum 2003-137 which is to balance environmentally responsible energy development with sensitive resources. The DEIS/RMP has not demonstrated that it actually utilized this information in the land use planning process, ensuring that access and a availability of the public land for energy resources are not unduly restricted.	Please see general comment response #18 and #149
Dolar Energy, L.L.C.	Minerals and Energy Resources	Notwithstanding BLM's multiple use mandate, the Preferred Alternative (Alternative D) is the most restrictive of the Alternatives on many resources/land uses. BLM's selection of Alternative D as their Preferred Alternative is disheartening because it demonstrates a bias against energy and minerals.	Please see general comment response #45
Dolar Energy, L.L.C.	Minerals and Energy Resources	The DEIS contains an inadequate Reasonably Foreseeable Development scenario for oil and gas activities. The DEIS simply identifies restrictions without any apparent consideration or description of expected future uses. We suggest the plan be restructured so foreseeable development can be addressed within the DEIS and avoid unnecessarily extensive and costly project level NEPA documentation of future projects.	Please see general comment response #53
Dolar Energy, L.L.C.	Process and Procedures	BLM indicates on page 1-17 that collaborative management is a priority. Consequently, BLM will seek to "increase the use of citizen and organizational volunteers to provide greater monitoring of resource conditions under site-stewardship programs and to complete on-the-ground developments for resource management and human use and enjoyment." While we recognize that the use of licensed contractors to ease the work load of the BLM due to budget and staffing constraints, the use of volunteers must be very strictly scrutinized before being employed. The concept of collaboration is to provide the public a format to participate in planning; however, Management of federal lands cannot legally be transferred to private interests by the BLM, and organizational volunteers will always pursue a specific agenda which may or may not agree with the existing Management of the Field Office.	Volunteer activities are directed by employees with expertise in carrying out the specific tasks being performed.
Dolar Energy, L.L.C.	Socioeconomics	BLM is required to incorporate social science considerations into the planning process by statute and executive order. According to the BLM Planning Handbook, a RMP should focus on a detailed analysis for each community based upon current conditions and trends, including projection of future trends. The DEIS does not address all aspects of the positive economic benefits associated with current and future oil and gas activities. The DEIS includes goods, services, part-time and full-time employment in the Reasonably Foreseeable Development scenario, but fails to address significant state and local revenue generated to a variety of taxes paid to the state and local governments. Another major contribution to the economy made by the oil and gas industry is payments to the federal government, 50 percent of which is returned to the state which apportions appropriate revenue to counties, in the form of federal lease rentals, lease bonus payments, and royalties generated from federal activities on public land.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, section 4.6. A discussion of the fiscal impacts of plan decisions on state and local governments has been added to Chapter 4.

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		In identifying alternatives, the federal government has an obligation to state and local governments to ensure their economies will not be severely adversely affected by federal land management policies.	
Dolar Energy, L.L.C.	Special Status Species	BLM's first Significance Criteria for Special Status Species states "Any surface disturbance and/or human activity within potential or occupied habitat, including designated critical habitat, for a federally listed species may be significant and would require consultation with USFWS." There are several federally listed species for which potential habitats have been identified, mapped or modeled over wide expanses of BLM lands, but have not been confirmed. For example, Mexican spotted owl habitat has been modeled as occurring over much of Utah. In reality, actual habitat has been identified as a fraction of the initial outline. At the expense of industry several surveys conducted in the Price Field Office have determined areas mapped as potential Mexican spotted owl habitat where nesting and hunting habitat elements do not actually occur. BLM should modify its position so that it provides opportunity for the energy and mineral industry (and other public land users) to verify the occurrence (or non-occurrence) of threatened or endangered species (T&E) habitats or populations prior to BLM determining a proposed action as having a significant impact. The issues for all fish, wildlife, flora and fauna happen on a site specific basis, and should be addressed as such. Under the significance criteria described on page 4-155, the Draft RMP/EIS states 25 acres of crucial habitat disturbance is considered a "significant" loss. We believe determining the significance of habitat disturbance, fragmentation or loss is a site-specific and land use-specific judgment that is based, in part, on the extent of similar habitats within the immediate and surrounding area, the status of the fish or wildlife population (s) that are using and are affected by that specific habitat, and the type/magnitude/timing of the land use activity that is proposed within the crucial habitat. All energy and mineral actions on BLM lands go through the NEPA process, requiring at a minimum an Environmental Assessment level of analysis. Under NEPA determination of a "significant" impact has a severe effect on a proposed public land activity by triggering the need for an Environmental Impact Statement, which should better identify the determination of significant loss.	Please see general comment response #7
Dominion Exploration and Production, Inc	Minerals and Energy Resources	the RMP/DEIS fails to disclose whether these approval conditions will take the form of lease stipulations and if so, whether those stipulations will be limited to those in existence at the time of lease issuance.	Please see general comment responses #49 and #110
Dominion Exploration and Production, Inc	Process and Procedures	The BLM conducted a public meeting concerning the RMP/DEIS in Salt Lake City, Utah on August 31, 2004. Dominion is concerned that the hearing format may not have complied with federal law that requires the BLM afford the public 'opportunities to meaningfully participate in and comment on... the BLM is legally obligated to document the 'public participation actives... by a record or summary of the principal issues discussed and the comments made.'... Dominion is concerned that the BLM's failure to afford interested parties the opportunity to meaningfully participate in this public meeting could open the RMP/DEIS to a future legal challenge.	See general comment response #145. BLM provided informational meetings on the DRMP/DEIS in August. The Salt Lake meeting was held on August 31, 2004. These meetings were conducted for informational purposes for a variety of topics relative to the Draft document. BLM documented all public outreach activities, including these informational meetings. In addition, BLM provided a multi-faceted outreach strategy in order to involve the public in all phases of this collaborative planning effort, including but not limited to: Federal Register publications, planning bulletins, open houses for scoping and other

Organization	Category	Comment	Response
			informational purpose, news releases, website notification, television promotion, as well as informational meetings on the DRMP/DEIS. The DRMP/DEIS Chapter 5 of the Proposed RMP/Final EIS summarizes this information.
Dominion Exploration and Production, Inc	Wildlife and Fish	First, although the RMP/DEIS requires the Price Field Office to consider seasonal closures for motorized travel within crucial wildlife areas, it fails to define the nature, duration, and timing of the closures or whether oil and gas service vendors and drilling and completion equipment would be included. Closures could have severe adverse effects on maintenance and servicing of wells as some wells must be maintained daily or at least several times each week.	Please see general comment response #42
Duchesne County Chamber of Commerce	Minerals and Energy Resources	Oil and gas development is critical as we try to build sustainable economies in Northeastern Utah. Recent years remind us of the devastating result when our region loses the ability to compete in a global economy. Our people and families have waited for years to be able to provide for their families adequately. Oil and gas development can take place in a balanced and efficient way, which is compatible with good environmental policy. Natural resource development is a part of the culture and history of our area. We are proud to help America meet its energy needs.	Please see general comment responses #1, #18 and #132
Duchesne County Commission	Minerals and Energy Resources	Currently, Duchesne and Carbon Counties are aware of increased travel in the Nine Mile Canyon area due to many factors such as: oil and gas production and an increase in tourism. Both counties recognize a need to upgrade existing roads to improve the well being of the land and citizens. In a joint effort, we have been involved in seeking resources to assist in this purpose. We propose that we gain access to tar sand or natural asphalt reserves in the area on BLM managed property without cost.	Asphalt reserves, tar sand, and oil shale are leasable minerals. It is BLM's policy to make these materials available to the public and local governmental agencies whenever possible and wherever environmentally acceptable (see Draft EIS Maps 2-37 through 2-41 for areas closed to mineral material disposal due to resource conflicts). BLM sells mineral materials to the public at fair market value, but gives them free to states, counties, or other government entities for public projects. Asphalt, tar sand and oil shale are subject to the combined hydrocarbon leasing regulations, 43 CFR 3140, and cannot be disposed as a saleable mineral (mineral material) like regular sand and gravel. The counties would have to purchase leases for these materials according to the required leasing procedures.
Duchesne County Commission	Minerals and Energy Resources	Currently, Duchesne and Carbon Counties are aware of increased travel in the Nine Mile Canyon area due to many factors such as: oil and gas production and an increase in tourism. Both counties recognize a need to upgrade existing roads to improve the well being of the land and citizens. In a joint effort, we have been involved in seeking resources to assist in this purpose. We propose that we gain access to tar sand or natural asphalt reserves in the area on BLM managed property without cost.	Asphalt reserves, tar sand, and oil shale are leasable minerals. It is BLM's policy to make these materials available to the public and local governmental agencies whenever possible and wherever environmentally acceptable (see Draft EIS Maps 2-37 through 2-41 for areas closed to mineral material disposal due to resource conflicts). BLM sells mineral materials to the public at fair market value, but gives them free to states,

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Dunes and Trails ATV Club	Alternative Maps	The Chimney Rock/Summerville Trail System and the Arapeen Trail connector routes do not appear on any of the maps. There is no information about whether these trails will remain open. We cannot assume what their status will be in the BLM plan. These established OHV routes are very important, and our club strongly requests that these trails be identified on the maps and left open for motorized recreation.	Please see general comment response #31
Dunes and Trails ATV Club	OHV Route Identification	As a family of off- highway vehicle enthusiasts and board members of a non-profit ATV club with over 100 other families, we are very concerned that trail routes and camping areas we have used in the past will no longer be open to OHV use. We feel that our input has been disregarded by your office and our public comments were not a component of the proposed resource management plan. Many people worked very hard to map and document the currently used trails and roads that we plan to continue using for our sport. It has come to our attention that much of the documentation has been disregarded, as many of the trails do not appear on the maps in the appendix of the Resource Management plan document. Examples of currently used trails left off are the Chimney Rock/Summerville trail system and Arapeen Trail. Then there was Junes Bottom, Segers Hole and Muddy Reef Road that were closed for no reason other than what we feel were arbitrary and invalid reasons.	Please see general comment responses #10 , #20 and #81

Organization	Category	Comment	Response
		We know you have a tough job, balancing needs of many diverse user groups, but as a public entity, we feel you are not protecting the rights the public, otherwise know as WE, THE PEOPLE. We understand that the easiest way of "managing" is to just close it down. But this is no solution; there are hundreds of thousands of OHVs in this country and we must count on your desire to serve the public and your departmental integrity to do what is right for all the users of the public lands in this great country. Please note our strong objection to closing any existing OHV routes or to limiting group size of camping on public lands. Diminishing available trails, limiting dispersed camping and closing down previously open routes is unwise, unfair and will no doubt lead to abuse of environmentally sensitive, protected areas, from those who are possibly unscrupulous, uneducated riders. Those very individuals have caused great harm to the reputation of responsible OHV riders, but if we are to keep legal riding legal, the damage should be minimal to both the land and to the OHV community as a whole. Please correct what we feel are serious problems, in writing, with what is to be the final plan. Thank you for your time and serious consideration of our opinions. We speak for all members of the Dunes and Trails ATV Club.	
Dunes and Trails ATV Club	OHV Route Identification	Many routes have already been closed to motorized recreation in the San Rafael Route Designation Planning Area. We very much oppose closing any more. None of the alternatives state exactly what closures and changes will be made to the San Rafael RDP. We request that any and all changes to the travel routes in this area be stated clearly in each of the alternatives in the DRMP/DEIS.	Please see general comment response #20
Dunes and Trails ATV Club	OHV Route Identification	The critical decisions about which routes will remain open and which will not must not be hazy. The instructions about the route designations which are given in the DRMP/DEIS are not clear. The matter is further complicated by the several different groups of management involved. The travel rules in the SRMA and ERMA are so difficult to understand that there will be poor compliance. We request that management be simplified. We request that the instructions for route designation be stated clearly and that the exact travel routes and rules be identified in each alternative.	Please see general comment response #20
Dunes and Trails ATV Club	OHV Route Identification	It is important for the BLM to realize that OHVers can and want to be valuable assets and partners with the BLM in the management of our federal lands. Our concern with the DRMP/DEIS that the Price Office is proposing is that OHV recreation has not been correctly identified and disclosed. We specifically point out the following items which need to be further addressed. 1-Dispersed Camping - Many OHV enthusiasts desire the opportunity for dispersed camping. The plan does not clearly state how many dispersed campsites will be available under each of the different alternates. We request that all the numbers in the final EIS draft be stated. 2- Limits on Dispersed Camping - The group size limits proposed in Alternatives A through D would be difficult to comply with because they are difficult to understand. Whenever restrictions are not clear, there will be poor compliance. Our club feels these overly restrictive and complicated requirements are not necessary. We request that these limits and restrictions be removed. 5- Group Size Limits - All of the alternatives impose group size restrictions. They all impose the burdensome Special Recreation Permit process on small and mid-sized non-profit groups. These are the very groups which can and should be the partners with the BLM to help manage and improve this area. These are the groups which will be willing to provide many hours of volunteer help if they feel they are being treated fairly. We feel that a non-profit group with less than 50 vehicles should not be unnecessarily subjected to the same requirements as commercial enterprises. We request that this restriction for less than 50 vehicles in a non-	See general comment responses #19 and #20

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		profit group be removed.	
Dunes and Trails ATV Club	OHV Route Identification	3- Missing Trails - The Chimney Rock/Summerville Trail System and the Arapeen Trail connector routes do not appear on any of the maps. There is no information about whether these trails will remain open. We cannot assume what their status will be in the BLM plan. These established OHV routes are very important, and our club strongly requests that these trails be identified on the maps and left open for motorized recreation. 4- Road and Trail Changes - Many routes have already been closed to motorized recreation in the San Rafael Route Designation Planning Area. We very much oppose closing any more. None of the alternatives state exactly what closures and changes will be made to the San Rafael RDP. We request that any and all changes to the travel routes in this area be stated clearly in each of the alternatives in the DRMP/DEIS. 6- Route Designations - The critical decisions about which routes will remain open and which will not must not be hazy. The instructions about the route designations which are given in the DRMP/DEIS are not clear. The matter is further complicated by the several different groups of management involved. The travel rules in the SRMA and ERMA are so difficult to understand that there will be poor compliance. We request that management be simplified. We request that the instructions for route designation be stated clearly and that the exact travel routes and rules be identified in each alternative.	Please see general comment responses #19 and #31
Dunes and Trails ATV Club	Recreation	Many OHV enthusiasts desire the opportunity for dispersed camping. The plan does not clearly state how many dispersed campsites will be available under each of the different alternates. We request that all the numbers in the final EIS draft be stated.	Please see general comment response #81
Dunes and Trails ATV Club	Recreation	The group size limits proposed in Alternatives A through D would be difficult to comply with because they are difficult to understand. Whenever restrictions are not clear, there will be poor compliance. We request that these limits and restrictions be removed.	Please see general comment response #81
Dunes and Trails ATV Club	Recreation	All of the alternatives impose group size restrictions. They all impose the burdensome Special Recreation Permit process on small and mid-sized non-profit groups. These are the very groups which can and should be the partners with the BLM to help manage and improve this area. These are the groups which will willing provide many hours of volunteer help if they feel they are being treated fairly. We feel that a non-profit group with less than 50 vehicles should not be unnecessarily subjected to the same requirements as commercial enterprises. We request that this restriction for less than 50 vehicles in a non-profit group be removed.	Please see general comment response #81
Emery County Economic Development Council	Process and Procedures	The RMP document should be reviewed and edited to produce a more “user friendly” document. The size and layout of the document makes it very difficult to use. An effort should be made to clarify and condense the information contained in the document in order to avoid oversights and potential errors and omissions. Due to the potential impact of the documents proposed management plan, a more thorough “public involvement” process should be established. Only a small percentage of the general public have been involved in the planning and policy development process. The BLM should develop a better “system” of public involvement. The current system does not seem to produce the desired results.	Please see general comment responses #123 and #145
Emery County Economic Development Council	Process and Procedures	The RMP should be consistent with Utah Code Section 63-38d-401, all other state laws, Emery County General Plan, Carbon County Master Plan and any other local provision which are not directly contravened or preempted by federal law. It is vital to the socioeconomic health of Emery County that multiple use and sustained yield management practices be maintained.	See general comment response #29

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		The Congressional mandate of FLPMA is to manage public lands on the basis of multiple use and sustained yield, 43 U.S.C. § 1701(7), and to develop, maintain and revise land use plans observing the principles of multiple use and sustained yield, giving priority to the designation and protection of areas of critical environmental concern ("ACECs"). 43 U.S.C. §§ 1712(c)(1), (3).	
Emery County Economic Development Council	Process and Procedures	The RMP should not produce management concepts that seek to unlawfully withdraw from multiple use sustained yield management, significant acreages of public land currently open to mineral development under the terms and conditions of the existing multiple use sustained yield Congressional mandate. New management tools should be used only within the context of and consistent with, the multiple use sustained yield mandate of FLPMA as well as the mineral resource development and extraction mandate of local county plans.	Please see general comment responses #1 and #29
Emery County Economic Development Council	Socioeconomics	The RMP does not recognize the extent that public land plans affect the socioeconomic base of the local communities. First, after having been reviewed by the Price Field Office, the Utah State BLM Office, and the Washington BLM Office, the RMP was delivered to the public minus a Socioeconomic section. Second, a socioeconomic report was then distributed which was obviously a "cut-and-paste" insert developed for a Resource Management Plan in the state of Wyoming. Local concerns and issues are not adequately addressed. Grazing, gas and mineral development and extraction, water rights and usage, OHV recreation, tourism, camping and hiking, energy production and a range of other uses all play an important role in the economic development of Emery and Carbon counties. A much more thorough and comprehensive socioeconomic analysis should be completed on the current and future impacts related to implementation of management provisions in the RMP.	See responses to specific comment #6834 and general comments #2 and #132.
Emery County Economic Development Council	Socioeconomics	Section 2.2 Resources: Recommendation: A sub-section should be added to Section 2.2 Resources titled 2.2.11 Human Resources. A tremendous volume of knowledge on cultural aspects, historical aspects, land usage patterns, range management practices, etc…is stored in the recollections and histories of the people living in and around the Swell as well as guides, environmentalists, and travelers who frequent the Swell. The RMP states that "Public involvement, consultation, and coordination have been at the heart of the planning process leading to this Proposed RMP." Public involvement, consultation and coordination must continue to be at the heart of the management decision making process in order to achieve an acceptable balance between conservation and public land usage. 2.2.11 Human Resources: • Work to develop an "economic development impact team" to address the potential socioeconomic impacts to local communities from the RMP. • Work to preserve the cultural and historical knowledge base contained in the local communities and frequent visitors to the area. Facilitate protection of historical documents and histories relating to the Swell. • Work to develop a community / visitor resource team to identify specific human resources related to the Swell that can add value to the management decision making process. • Identify "human resource systems" already in place. Develop a cooperative management policy to manage and mitigate impacts to these systems based on new resource management policy decisions.	This RMP makes decisions for the resources and resource uses in the Price Field Office. While the commentor's statement of local knowledge, history and recollections is accurate, and the information referred to extremely valuable, this RMP cannot make decisions on human resources. Local histories, cultural and social background, and other similar information the commentor references have been sought and used in the RMP decision-making process. In addition, an Appendix has been added to the Proposed Plan/FEIS summarizing the results of the recent Utah State University public lands survey of local residents, commissioned by the Governor's office. See general comment response #132.
Emery County Public Lands Department	ACEC	Need statement which says size of ACEC should only be as large as needed to protect the area from "irreparable damage".	The management prescriptions for the ACECs are limited in scope to protect the relevant and important values. BLM maintains that the size of

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			the ACEC areas is appropriate for protection of the relevant and important values identified. Also, see GCR 155.
Emery County Public Lands Department	ACEC	Background for existing ACECs needs to be provided. Appendix 26 does not discuss existing ACECs. Section 3.4.2 of the Draft RMP (affected environment) contains this information. Each ACEC needs to be re-evaluated and analyzed again for the proposed plan. This includes demonstrating that “special management attention is required” to “protect and prevent irreparable damage” to the respective area or resource. The analysis of proposed ACECs presented in Appendix 26 fails to meet this standard.	See GCRs 127 and 155.
Emery County Public Lands Department	ACEC	We are concerned about excessive acreage potentially affected by “special management” implementation. The proposed Uranium Mining District, Heritage Sites and Rock Art Sites ACECs have arbitrary and excessive boundaries depicted on respective maps. Standard Lease terms for oil and gas doesn't allow activity within 100 feet of archeological sites, wouldn't something of this nature be adequate rather than a one mile corridor?	See GCR 155.
Emery County Public Lands Department	ACEC	Neither grazing nor surface occupancy for oil and lax gas exploration or extraction necessarily results in “irreparable damage” and should not be precluded in ACECs. Grazing is well understood to be a use based upon a renewable resource. We also believe that the effects of mining and oil and gas activities are reparable. Section 1610.7-2 of the CFR is not license for summary exclusion from the land of any class of activities such as grazing or mineral or energy production. The standard set by law is not mere “damage” but “irreparable damage “. Many of the existing and proposed ACECs are designated in Alternative D as either NSO, or closed to leasing. Oil and gas development can be consistent with the values of many of these ACEC's. We don't feel that NSO or closed to leasing status should be automatic. Other surface restrictions can prevent irreparable harm to the values of some” of the ACECs.	See GCR 153.
Emery County Public Lands Department	ACEC	p 4-516, 517: What are the resources in the potential “Uranium Mining District” ACEC? The area has been criss-crossed by dozer work in an attempt to reclaim the area. It would be especially well suited for a play area.	Appendix 26 of the Draft RMP/EIS and Appendix L of the Proposed RMP/Final EIS identify the relevant and important values present in the Uranium Mining Districts potential ACEC.
Emery County Public Lands Department	Alternative Maps	Maps which represent open OHV routes 2-54, 2-55 and 2-56 should not include county roads which have not been designated open by the respective county.	Designated routes would only be assigned on BLM administered lands. Connecting routes over state, county and/or private property are shown for continuity purposes only.
Emery County Public Lands Department	Alternative Maps	The map numbers referred to within the discussion of each commod ity do not match the map numbers for those respective commodities.	The Proposed RMP/Final EIS correctly references the maps.
Emery County Public Lands Department	Alternative Maps	Streams which are considered intermittent and streams which are considered perennial need to be identified by the PFO. A map representing such should be developed. Centerlines and 100-year floodplains also need to be clarified and identified at some point.	Because riparian vegetation indicates availability of water, Map 3-4 (riparian habitat) in the Proposed RMP/Final EIS is the best map available that can display where both perennial and intermittent streams may occur.
Emery County Public Lands Department	Alternative Maps	There is no map which represents the “Crucial Fawning Areas and referred to as “crucial or high-value fawning and calving” areas in Appendix 16. It is impossible to determine the extent of the NSO impact without such data.	Deer and elk calving/fawning habitat is identified on Map 3-12a of the Proposed RMP/Final EIS.
Emery County Public Lands Department	Alternative Maps	Map 3-20, Coal Bed Methane Occurrence Potential: The UGS feels the rating of L/C in the northwest corner should be changed to H/C due to a recently defined “fairway” of thick coal deposits in the Emery Sandstone Member of the Mancos Shale. Map 3-21, Conventional Oil and Gas Occurrence Potential: The UGS disagrees with H/C rating for much of the	Maps 3-20 and 3-21 in the Proposed RMP/Final EIS show the ratings as suggested in the comment.

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		area to the northwest of the San Rafael Swell. The area should be rated H/D. USGS, 1995 National Assessment of US Oil and Gas, has defined four conventional gas plays which have had economic production in, or near, the Price RMP area.	
Emery County Public Lands Department	Alternative Maps	Oil and Gas: Map 17 of the Mineral Report does not reflect the overlap of the oil and gas play area because the mapping scheme is not transparent. Multiple vertical plays underlying the same area need to be shown and not merged into a one-dimensional geographical representation.	Maps 3-18 through 3-27 of the Proposed RMP/Final EIS present the mineral potentials for the Price FO area. Overlaps have been analyzed in the text of the Final EIS.
Emery County Public Lands Department	Alternative Maps	Map 3-21 of the R W, Conventional Oil and Gas Occurrence Potential, incorrectly labels the combined area of all the plays from Map 17 as having high occurrence potential with only “C” level of certainty rather than a “D” level of certainty for those plays that contain producing oil and gas fields that provide “abundant direct and indirect evidence” to support the presence, and likely future development potential of petroleum resources. Coalbed Methane- Although the UGS has sent comments in the past requesting the addition of a new CBM play covering the coals of the Emery Sandstone Member of the Mancos Shale, no such play is included in the Mineral Report (Map 27) or the RMP (Map 3-20). This new play has emerged since the USGS completed its 1995 national oil and gas assessment and there are currently two companies exploring this play in the planning area (Petro-Canada and Fortuna, USA).	Maps 3-20 and 3-21 in the Proposed RMP/Final EIS show the ratings as suggested in the comment.
Emery County Public Lands Department	Cultural Resources	HISTORIC SITES- There is insufficient discussion of recognized historic sites, particularly recorded historic sites such as the Old Spanish Trail and the D&RGW Railroad grade. The railroad grade was created between 1880 and 1883 and covers more than 60 miles within Emery County. While prehistoric sites and recent mining sites have received specific protection through the RMP, some of these more sizeable and equally important historic sites are not addressed adequately.	Specific Goals and Objectives for the Old Spanish National Historic Trail can be found in Table 2-21 of the Proposed RMP/Final EIS with specific management. Cultural management of linear resources (Table 2-4) would provide the necessary protection for the D&RGW railroad grade.
Emery County Public Lands Department	Forestry and Woodlands	The discussion of Forestry and Woodlands on page 2-55 and 2-56 states that for all but the No Action alternative, all decisions would be on a case by case basis until a Forest and Woodlands Management Plan was developed. However, Maps 2-10 and 2-11 portray major land use management decisions. The decision to virtually eliminate all gathering of downed fuel wood in the complete Price Field Office area is on the edge of an arbitrary and capricious decision. This is a massive decision change, especially since “Gathering downed fuel wood” was not identified as an Issue and providing fuel wood is identified as a Goal and Objective of the management of this resource.	The Proposed RMP/Final FEIS has been changed to resolve the inconsistencies (Table 2-13) and add references to Maps 2-10 to 2-14 and Map 2-59. The Proposed RMP/Final EIS also clarifies apparent discrepancies between ACEC and Forestry and Woodland management.
Emery County Public Lands Department	Lands and Realty	The only alternative that provides a realistic, economics based decision criteria is the No Action Alternative which allows for Discretionary ROWs for specific projects though a permitting process. Alternatives A and D have more limited flexibility, but given the developing gas and energy markets in the area, any restriction on major ROWs that is not based on the individual situation for the ROW is not a beneficial use of the land resource.	In the Proposed RMP/Final EIS (Table 2-16), Alternatives A and D still retain the discretionary flexibility of the No Action Alternative. They preclude ROWs in WSAs and put restrictions on Communication sites.
Emery County Public Lands Department	Livestock Grazing	Page 2-41, We believe a 9-mile buffer zone from domestic sheep to Bighorn Sheep habitat is excessive. Change in classification from cattle to sheep is rare but should not be prohibited by a 9-mile buffer zone, especially when no evidence of disease cross-over has been produced. No acceptable alternatives are offered.	See GCR 98.
Emery County Public Lands Department	Livestock Grazing	Probably the most significant proposed change in grazing administration and the most problematic is the proposal of relinquishing grazing permits when requested by the permittee, and then these permits could be allocated to other uses, including wildlife.	The voluntary criteria contained in the Draft RMP/EIS have been changed in the Proposed RMP/Final EIS to be consistent with BLM policy. The policy is detailed in Table 2-14, “Livestock Grazing”.
Emery County Public	Livestock Grazing	It is their position that the Draft RMP has a general anti-grazing bias and that on-going issues of improving water	See GCR 33.

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Lands Department		quality, riparian areas, vegetation and wildlife cannot all be solved by reduced grazing. The Emery County General Plan states that any reduction in grazing AUMs will be based on well-documented, sound, scientific fact and data. Since Permit holders benefit greatly from the multiple-use/sustained yield management of public land, they are vitally interested in effective and productive management of public lands and intend to cooperate in improving the rangeland health of our these lands. Grazing should remain a viable part of the economies of Carbon and Emery Counties and be recognized as such in each alternative.	
Emery County Public Lands Department	Livestock Grazing	P. 4-178, 4-179 of the Draft RMP/EIS discusses Sheep and Bighorn Sheep Habitats. The nine (9-) mile buffer is extreme There is no basis to restrict grazing to an area that expands beyond existing private land that contains sheep. Furthermore, the 9-mile buffer potentially removes the possibility of transitioning existing cattle allotments to sheep allotments during the life of the plan.	See GCR 98.
Emery County Public Lands Department	Minerals and Energy Resources	P. 2-96 states that no new Mineral Leases are available in WSAs. The BLM is very aware of the potential development of the Lila Canyon Mine and the associated economy benefit of the mine (discussed in 4-7) Despite the fact that BLM recognizes the potential economic benefit of the mine (150 to 200 new jobs) there is insufficient discussion in the RMP about a long term solution to develop the coal resource in this area. We recognize the identified WSA over some of the lease area, but the plan fails to attempt to work a long term solution to the conflicts.	BLM policy, 43CFR 3461.5 (d)(1) for lands designated as WSAs and the BLM Wilderness IMP (H-8550-1), designate all WSAs as unsuitable for leasing. Unleased lands are unsuitable for leasing until Congress acts on the WSA. Therefore, the unleased Federal coal in the Lila Canyon/Little Park lease area (approximately 300 acres) under the Turtle Canyon WSA is unsuitable for further coal leasing consideration. Existing lease activities can continue in these areas as long as there are no impacts on Congress's ability to designate them as wilderness.
Emery County Public Lands Department	Minerals and Energy Resources	There is a definite and discernable weighting toward Recreation as opposed to other uses. Under the current policy of Multiple Use, all uses are to receive the same consideration for use as another. In the DRMP, this is not the case. When weighting oil and gas exploration as opposed to recreation opportunities in 9- Mile canyon, for example, the assumption is made that drilling will negatively impact recreation and archeological sites, however, comparatively less information is presented on the impacts that recreation has on the oil and gas industries. The weighting should be equal.	The RMP is required to be a Multiple Use Plan. Multiple Use, as defined in FLPMA provides for managing the public lands and their various resources so that they are utilized in the best 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 preferred alternative in the Draft RMP/EIS reflects 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 and resource uses are provided in the Proposed RMP/Final EIS, including those that provide protection for sensitive resources. Also see GCRs 51, 52 and 132.
Emery County Public	Minerals and Energy	There is little in the Draft RMP/EIS related to humates, gypsum, sand and gravel, stone, carbon dioxide, helium	The Draft RMP/EIS addressed the management

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Lands Department	Resources	Reserve. - The study area contains a major, nationally recognized helium reserve, oil shale and tar sands.	and impacts of salable minerals (sand, gravel, and stone) under mineral materials. Oil shale and tar sand management and impacts are deferred to the ongoing programmatic EIS. Humates, gypsum, carbon dioxide and helium were specifically addressed in Section 4.2.2, Cumulative Impacts of the Draft RMP/EIS.
Emery County Public Lands Department	Minerals and Energy Resources	Generally, the Draft RMP/EIS and associated mineral report correctly identify the occurrence of the energy and mineral commodities in the Price Field Office planning area, but significantly underrate the energy and mineral development potential of the planning area. Emery County believes that the PFO should redo its mineral potential reports and suggests collaboration with the State of Utah to do so.	The oil and gas RFD contained in Appendix M of the Proposed RMP/Final EIS has been accounts for additional development potential.
Emery County Public Lands Department	Minerals and Energy Resources	Impacts to Minerals and Energy, “Leasable Minerals”, “Oil and Gas”, Alternative D: Only Wildlife timing stipulations are discussed here, not NSO restrictions. We believe Appendix 8 is in error, and NSO wouldn't be used in Alternative D.	Appendixes 8 and 16 of the Draft RMP/EIS have been corrected and combined into Appendix G of the Proposed RMP/Final EIS to remove any inconsistencies. See GCR 41.
Emery County Public Lands Department	Minerals and Energy Resources	Appendix 23 acknowledges Bureau direction regarding integration of the Energy Policy and Conservation Act (EPCA) analysis into the planning process. However, the EPCA data is not readily discernible at the indicated locations. Additional, there are discrepancies concerning time frames. Time frames of 15 and 20 years are interchanged without consistency in reference to RFDs and other projections.	See GCR 52.
Emery County Public Lands Department	Minerals and Energy Resources	A coal occurrence map should be prepared showing the occurrence potential and certainty of occurrence ratings for the various coal areas.	A coal occurrence map has been added to the Proposed RMP/Final EIS as Map 3-25.
Emery County Public Lands Department	OHV Route Identification	Alternative D says OHV use will be open, closed or limited to designated routes on the respective maps. All alternatives eliminate areas which are Open with current management but fail to clarify what criteria will be used or what process will take place to determine designated routes within these areas.	See GCR 19.
Emery County Public Lands Department	OHV Route Identification	The San Rafael Route Designation Plan (SRRDP) of 2003 should be referenced in Alternatives A, B, C and D and on Maps 2-54, 2-55 and 2-56.	The San Rafael Routes have been added to all alternatives and shown on Maps 2-71 through 2-74 and Map 2-69 of the Proposed RMP/Final EIS.
Emery County Public Lands Department	OHV Route Identification	The proposed Chimney Rock and Arrapeen Trail systems should be given reasonable consideration in this document. We realize that the final “on the ground” product may not be determined by the Final RMPIEIS, but more likely following activity level planning. However, an inventory of some proposed systems could be incorporated into this planning process.	See GCRs 20 and 31.
Emery County Public Lands Department	Process and Procedures	A major weakness in the DRMP is the failure to demonstrate the success or failure of existing management practices within the study area.	Chapter 4 of the Draft RMP/EIS identifies impacts of current management practices. The analysis of impacts has been expanded in the Proposed RMP/Final EIS and has been changed from a table format to a text format to improve readability.
Emery County Public Lands Department	Process and Procedures	Alts. A, B, C, and D: Why is off-site mitigation “encouraged” and not required for actions that cause surface disturbance to crucial value habitat? Shouldn't this be required as it is in the No Action Alternative? Emery County is desirous that off-site mitigation be required, not suggested. If not, the overall impacts to wildlife from oil and gas development will be negative. We suggest that off-site mitigation be an explicit requirement to offset high-value habitat impacts from oil and gas development.	The National BLM policy on offsite mitigation is that the agency encourages willing partners to participate in offsite mitigation strategies (subject to 43 CFR 1784.1-1 (b)). BLM WO Instruction Memorandum No. 2005-069 states, “Policy: The BLM will approach compensatory mitigation on an “as appropriate” basis where it can be performed

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			onsite and on a voluntary basis where it is performed offsite. Further, this IM is not intended to establish an equivalency of mitigation policy by the BLM (i.e. acre for acre)".
Emery County Public Lands Department	Process and Procedures	Emery County would indicate to the BLM that we expect consistency with this and other state laws, the Emery County General Plan, and the Carbon County Master Plan to the fullest extent that the state and local provisions are not directly contravened or preempted by federal law.	See GCR 29.
Emery County Public Lands Department	Process and Procedures	P. 4-11and12 of the Draft RMP/EIS discuss the cumulative effects of the various alternatives. The cumulative effects from the No Action alternative are significantly more severe than the Cumulative effects of Alternative A. This is confusing because Alternative A should have more activities than the No Action alternative.	The cumulative impacts contained in Section 4.7 of the Proposed RMP/Final EIS have been rewritten to correct this problem.
Emery County Public Lands Department	Process and Procedures	Appendix 16 allows no waivers for most seasonal wildlife conservation restrictions. The appendix must allow of these conditions for each restriction.	Language has been added to Appendix G of the Proposed RMP/Final EIS to provide for "exception, waiver or modification" for each of the restrictions. See GCRs 41 and 42.
Emery County Public Lands Department	Process and Procedures	Emery County is concerned with the funding requirements. Current funding to adequately support the CLDQ is inadequate and the implementation of the RMP does nothing to add specific funding to the Quarry.	BLM will seek to obtain funding for implementation and mitigation of the selected alternative including additional funding for CLDQ. Also see GCR 147.
Emery County Public Lands Department	Process and Procedures	Despite the very beneficial relationship between Emery County and the BLM, enforcement within the PFO is currently insufficient, and the addition of new restrictions and modifications to land use will require additional field work to enforce.	See GCR 147.
Emery County Public Lands Department	Process and Procedures	Some decisions in alternatives lack any rationale in terms of the issues identified in the Purpose and Need statements. There are contradictions among various management decisions in the Preferred Alternative and probably the others as well.	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various resources and uses would change to meet the needs for the plan revision. Also see GCR 123.
Emery County Public Lands Department	Recreation	According to the Note at the bottom of the Recreation Opportunity Spectrum (ROS) Map 3-15, "Recreation Opportunity Spectrum Management is prescriptive within Special Recreation Management Areas (SRMA). ROS management serves as a guideline in areas outside the SRMAs. The ROS designations are developed internally within the BLM without any public process review. Adopting any of the SRMA proposals would mean that the ROS management prescriptions would be implemented without any public process or alternatives being evaluated through a public process.	See GCR 50.
Emery County Public Lands Department	Recreation	If all the Preferred Alternatives were adopted, the SRMA areas designated in the Preferred Alternative (Map 2-21) would have ROS management prescriptions in conflict with the Preferred Alternative Off-Highway Vehicle Recreation management prescriptions as represented in Map 2-16 and with the Preferred Alternative for High Use Areas as represented in Map 2-25.	See GCR 50.

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Emery County Public Lands Department	Recreation	"Quantification of the economic stimulus associated with recreation in the PFO is not possible at this dime due to lack of verifiable date on recreational use." This statement conflicts with page 3-48 that provides Visitor, Participant and Visitor Days data from the RMIS data system. Basically, if you look at both of these sections, one might determine that the methodology to determine the recreation data consists largely of "reservations, permits records, observations and professional judgment". The acknowledgement that verifiable data exists certainly seems to indicate that the major source of data is "professional judgment".	See GCR 118.
Emery County Public Lands Department	Recreation	Appendix 15, Recreation Opportunity Spectrum-Classification Standards: On-the-ground realities are inconsistent with the classification standards in the ROS. Most notable in the inconsistencies is the existence of roads and motorized routes within areas classified as Semi-primitive Non-motorized (SPNM) in the ROS.	See GCR 50.
Emery County Public Lands Department	Socioeconomics	Emery County takes issue with some statements in this section. Reference is made to the priority given to "collaborative management" and "The Four Cs". The statement is made that "BLM recognizes that social, economic, and environmental issues cross land-ownership lines and that extensive cooperation is needed to actively address issues of mutual concern." As this DEIS was being developed, Emery County continually expressed the importance of being involved in the development of the Socio-economic report and were assured that we would be directly involved when the time came to develop this report. Two events took place that lead us to believe that BLM does not yet recognize the extent that public land plans affect the socioeconomic base of the local community. First, after having been reviewed by the Price Field Office, the Utah State BLM Office, and the Washington BLM Office, the DEIS was delivered to the public minus a Socioeconomic section. Second, a socioeconomic report was then distributed which was obviously a "cut-and-paste" insert developed for a Resource Management Plan in the state of Wyoming. Because of these events, Emery County believes that local concerns and issues are not understood nearly to the degree that federal planners would have us believe. The PFO has since committed to a process to develop this report that will involve Emery County intimately. We expect fulfillment of that commitment.	See GCR 132.
Emery County Public Lands Department	Socioeconomics	A very large part of the economic base of Carbon, Emery and Sanpete counties comes from generating electricity, providing those plants with fuel, and auxiliary businesses associated with the workforce employed by those companies conducting business along the corridor. PacifiCorp Power Plants in Emery County generate 17,400 Megawatts annually. At a sale value of $20/megawatt, the annual revenues would be $350,000,000. They hire 750 employees (including their mining operations) and pay an annual payroll of over $64,000,000. Therefore, Emery county is concerned about any impact to this industry that might occur because of the designation of the San Rafael River as a Wild and Scenic River.	See GCR 132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of energy production to local communities. There would be no effect on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring Congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect on existing, valid water rights. Section 13 (b) of the Wild and Scenic 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 doesn't require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. Because the State of Utah has jurisdiction over water, BLM would be required to adjudicate the right as would

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			any other entity, by application through state processes. Thus, for Congressionally designated rivers, BLM may assert a federal reserved water right to appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. The BLM is fully evaluating and considering potential impacts related to these Wild and Scenic River decisions in this planning process. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Proposed RMP/Final EIS, and Appendix C is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river.
Emery County Public Lands Department	Socioeconomics	The Draft RMP/EIS fails to address the economic value of mineral development in order to weigh such value against other possible resource uses. Future gas production from public lands within e PFO will provide tax revenue to government and royalty revenue to landowners, possibly in amounts approaching hundreds of millions of dollars. Other. revenues which aren't adequately discussed include property taxes paid to counties, state income tax from industry employment, and sales/use/fuel tax from petroleum business expenditure.	The Proposed RMP/Final EIS socioeconomic impacts have been analyzed using the IMPLAN model. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. Property and income taxes are part of the “indirect” and “induced” income impacts in IMPLAN. Section 4.6 of the Proposed Plan has been revised to include a discussion of the fiscal impacts on state and local governments of plan decisions. Also see GCR 132.
Emery County Public Lands Department	Socioeconomics	Of particular concern is the failure to adequately address the contributions of the three power generation facilities in Carbon and Emery Counties. There is inadequate discussion of the current socioeconomic benefits of these facilities and a corresponding failure to address potential effects of the RMP to the power generation facilities. Of particular concern would be air and water quality issues, however other indirect impacts are also ignored. Future development of coal resources should be directly tied to the long term survivability of the power plants. The RMP only discussed the direct job increases or losses from mining without recognizing the effects to the power plants.	The Proposed RMP/Final EIS socioeconomic impacts have been analyzed using the IMPLAN model. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. The economic impacts of coal mining are addressed in Section 4.6. The impacts of the power plants are addressed under “cumulative impacts” Section 4.7 of the Proposed RMP/Final EIS. Also see GCR 132.
Emery County Public	Socioeconomics	Another related core industry that is not discussed in the RMP socioeconomic analysis is the trucking industry.	Section 4.6 of the Proposed Plan discusses and

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Lands Department		The economic benefits and impacts of this industry are tied to the other extraction and energy production industries. The trucking industry employs substantial numbers of local workers. Some estimates place the number of full time truckers at around 175 employees.	quantifies the indirect economic impacts of the coal industry on related industries, including trucking. See GCR 132.
Emery County Public Lands Department	Socioeconomics	The draft plan insufficiently recognizes the potential affects of the RMP to the valuation of the lands as the dollars return to the local government entities. As designation of land changes and the availability of resources changes, the perceived valuation of that land changes. This affects the ability of the local communities to acquire PILT funds. Furthermore, the more cost prohibitive development becomes, the lower the potential return of Mineral Lease and other funds.	Section 4.6 of the Proposed Plan has been revised to include a discussion of the fiscal impacts on state and local governments of plan decisions, including the potential loss to local governments from restrictions on oil and gas development.
Emery County Public Lands Department	Socioeconomics	Recreational activities generally do not generate the level of income, to private sources or to local taxing entities that mineral development and extraction will. Given this, the core emphasis for decision making criteria should be weighted toward the most `profitable' management practices, i.e., mineral development and extraction. The general tone of the plan is that recreation opportunities always take precedence over mineral extraction. This is in conflict with BLM policy as well as the general plan of Emery County.	The comment provides no examples of the “general tone” of the plan emphasizing recreation over mineral extraction. Therefore, BLM can offer only a general response. In its planning process, the BLM has analyzed alternatives ranging from maximum protection of natural resources consistent with law and policy, to maximum commodity production, consistent with law and policy. See GCR 2.
Emery County Public Lands Department	Socioeconomics	In relation to fluid minerals development, the general assumption seems to be that the solution to all conflicts is to allow for horizontal drilling or related technologies when conflicts arise. This fails to recognize the additional cost and technological challenges associated with this alternative.	See GCR 16.
Emery County Public Lands Department	Socioeconomics	The Socioeconomic section (4.12 though 4.15.4) is inadequate in relation to the discussion of the potential impacts to the power generation industry. In fact, the electric Generation Plants located in Huntington, Castle Dale (Hunter) and Price Canyon. are only directly addressed one time in the RMP. This is particularly noteworthy because Scottish Power, the parent company of the Utah Power, has been in preliminary discussions and study relating to the addition of 600 Mw generation facility at the Hunter Plant. The potential impact on jobs, water, vistas, and other related issues are woefully inadequate.	The Proposed RMP/Final EIS socioeconomic impacts have been analyzed using the IMPLAN model. This includes an evaluation of the economic contribution of power generation to local communities, such as Emery and Carbon counties. Also see GCR 132.
Emery County Public Lands Department	Socioeconomics	The BLM is required by statute, executive order, regulation and policy, to incorporate social science considerations into the planning process. The BLM is also required to manage the public lands on the basis of multiple use and sustained yield and to meet the needs of present and future generations. According to the BLM Planning Handbook, the focus of an RMP should include a detailed analysis for each community based upon current conditions and trends, including projection of future trends. An impact analysis is used to assess the social and economic consequences of implementing the various alternatives identified through the planning process. The impact analysis must also include income and employment for various economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns.	See GCR 132.
Emery County Public Lands Department	Socioeconomics	The Draft RMP and EIS also fails to recognize the socioeconomic importance associated with the development and use of water resources in the Price Field Office area. Emery County provided data in response to the Preliminary DRMP that detailed the water improvement projects past, present and future. Projects completed by the end of 2004 represent over $49 million and projected projects within Emery County represent over $100 million! The PFO apparently doesn't agree that these projects are significant enough to be discussed, nor potential impacts on the projects from implementation of the alternatives.	The ongoing water projects in Emery County have been added to the list of projects and considered in the “Cumulate Impacts” Section 4.7 of the Proposed RMP/Final EIS.
Emery County Public Lands Department	Socioeconomics	Wild and Scenic Rivers designations have the potential to impact federally funded water-related projects. Water resources are of equal interest to Carbon County and its communities. The Draft RMP and EIS does not address the potential socioeconomic impacts related to these concerns.	In 1994, Public Law 98-569 amended the Colorado River Basin Salinity Control Act and directed the Secretary to develop a comprehensive program for minimizing salt contributions from lands

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			administered by BLM and to provide a report on this program to the Congress and the Advisory Council. BLM's Colorado River Basin Salinity Control program is designed to provide the best management practices (BMP) of the basic resource base. Successes with the resource base will translate to improved vegetation cover, better use of onsite precipitation, and stronger plant root systems. In turn, a more stable runoff regime and reduced soil loss should result, thus benefiting water quality of the streams in the Colorado River Basin including the Green River and San Rafael River. In Section 1(b) of the Wild and Scenic Rivers Act, Congress states that one of the objectives of the Act is to protect the water quality of designated rivers. Congress further specified that the river-administering agencies cooperate with the EPA and State water pollution control agencies to eliminate or diminish water pollution (Section 2(c)). Comparing the two, it is clear that the Wild and Scenic Rivers Act and the Colorado River Basin Salinity Control Act are not only complementary of one another, but share the same objective with regard to water quality. The Wild and Scenic Rivers Act directs the Secretary of the Interior or any government agency to prohibit any loan, grant, license, or otherwise construction of any water resources project that would have a direct effect on the values for which such river designation was established. The law also states that it cannot preclude licensing of, or assistance to, developments below or above a wild, scenic, or recreational river area or on any stream tributary thereto that will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the National Wild and Scenic Rivers System. However, projects intended to comply with the Colorado River Salinity Control Act are those that would generally benefit stream segments instead of affecting or unreasonably diminishing its values including water quality.

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			The BLM is fully evaluating and considering potential impacts related to these Wild and Scenic River decisions in this planning process. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Final EIS, and Appendix C is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river.
Emery County Public Lands Department	Socioeconomics	The lack of consistency between the baseline profile (august 2003) and the Draft RMP/EIS causes confusion and creates a lack of confidence in the socioeconomic information. The lack of confidence is further supported by the lack of clarity of the impact analysis found in Section 4.12 of the Draft at pages 4-575 through 4-589. This "analysis" makes reference to Carbon and Emery counties, and the Price Field Office (PFO); however, it also contains confusing and ambiguous references such as, "the socioeconomic study area", "the region", "the PFO and the study area", "the PFO vicinity" and "the study period". It doesn't appear to truly address socioeconomic impacts related to the Price Field Office.	A new socioeconomic technical report was prepared in 2008 which replaced the 2003 baseline report (Booz Allen 2008a). The new report 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect industries (trucking,lodging, etc.). This 2008 report was the bases for the preparation of Section 4.6 of the Proposed RMP/Final EIS. See GCR 132.
Emery County Public Lands Department	Socioeconomics	the Draft at pages 2-6 and 2-7 describes Alternative A as "…designed to allow maximum access and development of mineral resources, including oil, gas, coal bed natural gas, and coal allowed by law, with mineral resource development given primacy over other uses and resource consideration. A comparison of the No Action Alternative to Alternative A, described at page 2-21 reveals an almost 90 percent increase in acreage. The analysis of this increase, as presented at page 4-584, characterizes the impacts to "Regional Income" as "not expected to be significant." This statement and a similar statement at page 4-586, which indicates that a loss of 70 jobs per year, "is not considered significant in the study area", seems to confirm that the socioeconomic analysis does not address the true impacts specific to counties associated with the Price Field Office.	The Proposed RMP/Final EIS Section 4.6.5 discusses the expected increase in employment and income of Alternative A as compared to the No Action Alternative. It no longer implies that the increase in not significant. These numbers are based on the IMPLAN model. See GCR 132.
Emery County Public Lands Department	Socioeconomics	The Socioeconomic section is inadequate in relation to the discussion of the potential impacts to the power generation industry in the area. In fact, the electric generation plants located in Huntington Canyon, Castle Dale (Hunter Plant) and Price Canyon (Carbon Plant) are only directly addressed one time in the Draft. This is particularly noteworthy considering that Scottish Power, the parent company of Utah Power, has been in preliminary discussions and study relating to the addition of a 600 Mw generation facility at the Hunter Plant.	Information about the power generation plants has been added to Section 3.6 and 4.7 (Cumulative) of Proposed RMP/Final EIS. Also Section 4.6 evaluates the socioeconomic impacts of the economic contribution of energy production to local communities, such as Emery and Carbon counties. See GCR 132.
Emery County Public	Socioeconomics	The baseline profile should be reviewed for inaccuracies and corrected as necessary. The inconsistencies	See GCR 132.

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Lands Department		between the baseline profile and the DRMP/EIS should be reconciled and the Socioeconomics section of Chapter 4 should be revised to present a detailed analysis of social and economic consequences of implementing the various alternatives, for each community in the Price Field Office area, in such a manner that the information can be clearly understood.	
Emery County Public Lands Department	Socioeconomics	Potential expansion of the PacifiCorp Hunter Plant, "The proposed project would increase local jobs during plant construction and provide approximately 350 additional long-term jobs in the region.": What is the source of this figure?	The source is Emery Power Plant Units 3 & 4: Department of the Interior Final Environmental Statement, prepared by the BLM, Department of the Interior, 1979, Table 1-10.
Emery County Public Lands Department	Socioeconomics	Loss of the ability to extract Utah coal would result in significant impact to electricity generation and the resulting cost to the consumer. It would also harm the local economies that are dependent on the Utah coal industry for primary and secondary jobs.	Only a small amount of coal is within WSAs and, therefore, is unavailable for leasing. See Map 2-56 of the Proposed RMP/Final EIS. Therefore, there should be little impact on the coal and power generation industries.
Emery County Public Lands Department	Socioeconomics	P. 4-575 of the Draft RMP/EIS discusses the basis for Significance Criteria and the first criteria is, "Substantial gains or losses in population and or employment. The term "Substantial' needs to be precisely defined because of the delicate nature of employment condition in the study area. In section 4-15, it states "Changes in overall employment are not expected (to) exceed 30 jobs so the impacts are not considered significant." 30 jobs added or lost in the study are would be a significant event in the local economy.	The significance criteria are no longer used in Chapter 4. Section 4.6 of the Proposed RMP/Final EIS has been revised using the IMPLAN model to discuss impacts which are greater than discussed in the Draft RMP/EIS. See GCR 132.
Emery County Public Lands Department	Socioeconomics	Page 4-576 has an error in the third paragraph. It states that the county specific data was obtained from the Minnesota IMPLAAN group. I do not believe Minnesota is the correct source of information.	The Minnesota IMPLAN Group is the company that developed the input/output model IMPLAN used in the socioeconomic analysis in Section 4.6. The company collected data for both Emery and Carbon counties from the U.S. Census, U.S. Bureau of Economic Analysis, U.S. Department of Labor, and other reputable sources. An additional socioeconomic technical description document is provided which details the methodology, calculations, results, and all sources used. See GCR 132.
Emery County Public Lands Department	Socioeconomics	Page 4-578 States that "A previous study by the State of Utah concluded that Carbon and Emery counties have a very small oil and gas industry". This quote was taken from the Utah Department of Natural Resources in 1995, prior to the development of the Coal Bed Methane industry in the study are. Today, Carbon and Emery Counties are among the top gas producing counties in the state and the number of new wells in the two counties are among the top 5 counties in the state. Since the 1995, a number of energy companies have opened permanent offices in the study area. Furthermore, a number of support industries have been created. This includes roustabout services, drilling, maintenance and road and pad development.	Section 3.6 of the Proposed RMP/Final EIS has been updated with more recent earnings and employment in the mining industry, which includes oil and gas, and concludes that this industry is very important to Carbon and Emery Counties.
Emery County Public Lands Department	Socioeconomics	Page 4-579 states that "Estimates of recreational use within the Price Field Office indicate that there may be several hundred thousand Recreational Visitors Days spent in this area." In the following paragraph it states that "Quantification of the economic stimulus associated with recreation in the PFO is not possible at this time clue to a lack of verifiable data on recreational use." It is somewhat disappointing that an undertaking as substantial as the RMP is being considered when the agency admits that they have insufficient data to accurately assess the benefits / impacts of the present management plan.	See GCR 118

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Emery County Public Lands Department	Socioeconomics	On Pages 4-580 and 4-581 discuss the activities relating to Regional Employment under the current management plan. The plan fails to recognize a number of activities and the related employment from those activities in the RMP area. Specifically, the mining and production of Humates (Hurnic Shale) and the mining and production of Gypsum.	Section 4.7.2 of the Proposed RMP/Final EIS specifically includes new gypsum, uranium and humate mines in the cumulative impacts analysis.
Emery County Public Lands Department	Socioeconomics	4-582, Impacts to Population: This section contains the socioeconomic impacts of the RMP/EIS and it states that "Activities within the PFO will continue to support a notable number of jobs in the study area. Because these activities are expected to continue under the No Action Alternative, it is not anticipated that continuing current management actions will significantly affect population trends". This is a disappointingly small reference in the RMP to the potential employment impacts of existing industry trends. In some areas, such as oil and gas development, the RMP has the potential to impact employment significantly, particularly over the short term. In the preceding paragraphs, it is pointed out that $9.6 million in Oil and Gas and $29 million in Coal development would be added to the local economy through the No Action Alternative.	The Proposed RMP/Final EIS has been revised to evaluate the economic contribution and social impacts of energy production, grazing, and recreation on BLM lands to Emery and Carbon counties. A discussion of this analysis is provided in Section 4.6. Additional clarity on the No Action alternative serving as the baseline, which all other alternatives are evaluated, is provided as is an estimate of the monetary oil and gas impacts of the RMP on all of the other alternatives using forecasted gas prices.
Emery County Public Lands Department	Socioeconomics	Section 4.15.3 Alternative B: The document states that "Changes in overall employment are not expected (to) exceed 30 jobs so the impacts are not considered significant." In the current economic environment in Emery County and Carbon County, the subtraction or addition of 30 positions would constitute a significant impact on employment.	Section 4.6 of the Proposed RMP/Final EIS has been revised using the IMPLAN model to discuss impacts on Carbon and Emery Counties. The impacts from the IMPLAN model show a greater impact than the 30 discussed in the Draft RMP/EIS. See GCR 132.
Emery County Public Lands Department	Socioeconomics	Generally, throughout section 4.12, Socioeconomics, there is a failure to address the potential impacts of the Guides and Outfitters for all of the Alternatives. Currently there are approximately 40 permitted land outfitters in the study area and an additional 80 on the Green River on the Eastern edge of the study area. These existing businesses employ - approximately 100 on a full or part time basis during peak seasons.	The Proposed RMP/Final EIS has been revised to include the economic contribution and social impacts of recreation on BLM lands to Emery and Carbon counties. The Proposed RMP/Final EIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities (including outfitters). The analysis was unable to provide quantitative estimate changes in jobs and earnings tied to recreation in the local area. Section 3.6 has also been augmented to discuss the contribution of recreation on the local economy.
Emery County Public Lands Department	Socioeconomics	Planning criteria bullet on socioeconomic impacts of the alternatives has not been thoroughly considered.	The Proposed RMP/Final EIS uses IMPLAN to evaluate the socioeconomic impacts the alternatives. This includes an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. See GCR 132.
Emery County Public Lands Department	Soil, Water and Riparian	Section 2.7.2.2 "Manage public lands in a manner consistent with the Colorado River Salinity Control Act". We believe that designation of river segments to the Wild and Scenic River System can eliminate federal funding for water projects, including those funded to adhere to the Colorado River Salinity Control Act and is therefore not consistent with the Colorado River Salinity Control Act.	In 1994, Public Law 98-569 amended the Colorado River Basin Salinity Control Act and directed the Secretary to develop a comprehensive program for minimizing salt contributions from lands administered by the BLM and to provide a report on

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			this program to the Congress and the Advisory Council. BLM's Colorado River Basin Salinity Control program is designed to provide the best management practices (BMP) of the basic resource base. Successes with the resource base will translate to improved vegetation cover, better use of onsite precipitation, and stronger plant root systems. In turn, a more stable runoff regime and reduced soil loss should result; thus, benefiting water quality of the streams in the Colorado River Basis including the Green River and San Rafael River. In Section 1 (b) of the Wild and Scenic Rivers Act, Congress explicitly states that one of the objectives of the Act is to protect the water quality of designated rivers. Congress further specified that the river-administering agencies cooperate with the EPA and state water pollution control agencies to eliminate or diminish water pollution (Section 2 (c)). Comparing the two, it is clear that the Wild and Scenic Rivers Act and the Colorado River Basin Salinity Control Act are not only complementary of one another, but with regard to water quality they share the same objective. It is true that the Wild and Scenic Rivers Act directs the Secretary of the Interior or any Government agency to prohibit any loan, grant, license, or otherwise construction of any water resources project that would have a direct and adverse effect on the values for which such river was established. The law also states that it cannot preclude licensing of, or assistance to, developments below or above a wild, scenic or recreational river area or on any stream tributary thereto which will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the national wild and scenic rivers system. However, projects intended to comply with the Colorado River Salinity Control Act are those which would generally be beneficial to stream segments, instead of adversely affecting or unreasonably diminishing its values including water quality.

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Emery County Public Lands Department	Soil, Water and Riparian	Page 2-28 Groundwater, Protection of Water Quality in Natural Springs,"The distance (of buffer zones) would be based on geophysical, riparian, and other factors necessary to protect the water quality of springs. If these factors cannot be determined, a 660 foot buffer zone would be maintained." How about maintaining the 660 foot buffer zone?	See GCR 70.
Emery County Public Lands Department	Soil, Water and Riparian	Page 2-29, Maintenance of Water Table in Wetland and Riparian Areas Alternatives A, B. C and D, "The water table in wetlands and riparian areas would be maintained or restored.": As pressurized irrigation systems eliminate loss of water from canal and ditch systems, it will become increasingly more difficult to maintain or restore the water table created by these systems. How controllable is this?	See GCR 72.
Emery County Public Lands Department	Soil, Water and Riparian	Page 2-29, "Allow no new surface-disturbing activities within 100-year flood plains,": This may be excessive and difficult to determine. Who is the final authority or what are the determining criteria?	This is a continuation of the existing restrictions related to flood plains. The Final authority is the Field Office Manager per the exception criteria.
Emery County Public Lands Department	Soil, Water and Riparian	The streams which comprise the San Rafael River drainages are currently functioning as water delivery systems for industrial, municipal and agricultural use. These watersheds are vital to Emery County. Any alteration or disruption of this system will dramatically affect the county communities and industry both economically and socially. Therefore, any designation as a Wild and Scenic River will affect the economy of Western Emery County.	The BLM preferred alternative in the Draft RMP/EIS has been revised to create the Proposed RMP in the Proposed RMP/Final EIS. The suitability discussions, particularly for the San Rafael River, in Appendix C of the Proposed RMP/Final EIS more thoroughly address the manageability factors. Also see GCR 86.
Emery County Public Lands Department	Soil, Water and Riparian	Emery County has nine incorporated communities within its boundaries. Eight of these communities are located in the western portion of the county at the base of the Wasatch Plateau. They are located along the rivers and major canals that transport water from the mountains into the valleys. The communities were located adjacent to the rivers to provide water for their municipal, agricultural and industrial needs. The people who live, and have lived in these communities are directly dependant on these water sources for their very existence. All aspects of their lifestyles, culture, attitudes, social structure, values and future population characteristics are influenced and impacted by the availability of water from these rivers. Any restrictions from Wild and Scenic River designation of the San Rafael River or encumbrances on this water would have significant negative effects on all of the citizens in these communities.	See GCRs 73 and 86.
Emery County Public Lands Department	Soil, Water and Riparian	It is impossible to consider management of the San Rafael River as an isolated river segment. The design of water storage facilities, delivery systems (canals, ditches and pipelines) and water demand of the two coal-fired power plants (Hunter and Huntington), has created a system that incorporates all of the San Rafael River system.	The BLM preferred alternative in the Draft RMP/EIS has been revised to create the Proposed RMP in the Proposed RMP/Final EIS. The suitability discussions, particularly for the San Rafael River, in Appendix C of the Proposed RMP/Final EIS more thoroughly address the manageability factors. Also see GCR 86.
Emery County Public Lands Department	Soil, Water and Riparian	Best Management Practice needs to be developed for stream and crossing for surface occupancy. In Chapter 4, P. 4-45, Establishment of Buffer Zones for No Surface disturbance Around Riparian-Wetland Habitats, the RMP doesn't adequately address this need. Disturbance: Stream crossings built properly, with off-site 1:1 mitigation should be allowed in Appendix 16.	BLM is required by Executive Orders 11988 and 11990 to protect and reduce impacts to wetlands and floodplains. Appendix G of the Proposed RMP/Final EIS provides for an "exception" to this restriction under specific conditions.
Emery County Public Lands Department	Soil, Water and Riparian	Page 4-41: Alternative D says the "water table in wetland and riparian areas would be maintained or restored". This implies unprecedented use of large quantities of water in a watershed where available water is drastically over allocated. Environmental conditions are probably the biggest factor in reduced acres of wetland and riparian areas.	This statement is a repeat of the management action identified on page 2-22 of the Draft RMP/EIS. Pages 4-41 to 4-45 of the Draft RMP/EIS describe the impact of that decision. The decision

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			in the proposed RMP/Final EIS has been changed to maintain or restore these areas when feasible.
Emery County Public Lands Department	Soil, Water and Riparian	Establishment of buffer zones for no surface disturbance around riparian-wetland habitats. Alternative D states that "Exception may be authorized by AO if it can be shown that the project as mitigated, eliminates the need for the restriction". The PFO RMP should specify the features necessary to demonstrate mitigation. The RMP should also state that exceptions will be considered for all activities including Minerals and Energy development.	The "exception" language for these buffers zones has been expanded and clarified in Appendix G of the Proposed RMP/Final EIS.
Emery County Public Lands Department	Soil, Water and Riparian	ES-2 Issues: This paragraph refers to "eight planning issues" that the EIS focuses on. What are the eight issues? ES-3 Recreation: Change second sentence to read: "Visitor use is exerting an impact on soil, water, vegetation, wildlife and other recreationists.	The Executive Summary has been completely rewritten and now focuses on the Proposed RMP and not the planning issues raised during scoping.
Emery County Public Lands Department	Soil, Water and Riparian	Fifth paragraph needs to clarify that the "individual and institutional owners of water rights both in Carbon and Emery Counties," means all of the tributaries of the Green River in the two counties. Also, the last sentence should be amended to read "Moreover, Utah through Divisions of Water Rights and Water Resources and its State Water Engineer, along with various water user associations and other individual and institutional holders of water rights in the Green and Colorado River systems, allocate and otherwise manage the rights to the water flowing through the Green River and all tributaries to the Green River. Sixth paragraph, last line should be amended to read "…to ensure that Utah's valid and existing ownership rights in and to the bed of the navigable portions of Green River, and state and local valid and existing rights in and to the water which flows through the entire stretch of Green River and tributaries to the Green River in the planning area, are not \infringed or compromised."	In the Proposed RMP/Final EIS Section 1.3, Description of the Planning Area, has been rewritten and shortened. This paragraph was removed because it was too detailed for this general level description of the area.
Emery County Public Lands Department	Special Status Species	Page 2-39 Special Status Species: Reference should be made under Goals to "Adhere to and use recommendations found in the Bureau of Land Management's National Sage-grouse Habitat Conservation Strategy."	See GCR 55.
Emery County Public Lands Department	Transportation and Access	2.3.5, Lands and Realty: Planning Criteria (1.5) states that RS 2477 rights-of-way won't be addressed in this plan but that they will be dealt with administratively. At some time these rights-of-way need to be addressed and incorporated into this plan. It appears that the stated goal to "make public lands available through rights-of-way…for such purposes as transportation routes…" would accommodate the RS 2477 rights-of-way.	See GCR 11.
Emery County Public Lands Department	Transportation and Access	Include a process for the pilots to "legitimize" the individual existing airstrips through the RMP at the activity level following the completion of this RMP.	The Proposed RMP would not change any existing policy, use or practice concerning backcountry airstrips. BLM recognizes that small aircraft, responsibly handled, cause minimal if any impacts to the resources or public lands in general. The existence of these backcountry airstrips has already been legitimized by the FAA and the Secretary of the Interior. See GCR 21.
Emery County Public Lands Department	Transportation and Access	Four airstrips are identified in the RMP but almost no additional details are given. There is no mention of an additional 7 to 11 existing airstrips within the PFO (some may be on private or state land). The DRMP should: "Continue to allow the use of existing airstrips for backcountry recreation under the classification of "Casual Use". Consider creation of a separate designation for backcountry airplanes so that the restrictions for motorized use are dealt with separately from OHVs and traditional motorized vehicles. Under current rules, it could be interpreted that the airstrips are off limits to the pilots unless the airstrips are designated routes as part of the route designation plans. A separate designation may be needed to clarify the distinction.	See GCR 21.
Emery County Public	Visual Resources	Page 2-39, Alternative D: The Lower Green River appears to be given an unnecessary VRM Class I designation.	Map 2-5 of the Proposed RMP/Final EIS corrects

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Lands Department			the Lower Green River VRM classification to a VRM Class III.
Emery County Public Lands Department	Wild and Scenic Rivers	Emery County has serious questions concerning the process of the Wild and Scenic River review. Early challenges concerning eligibility of dry washes were partially recognized late in the process.	See GCR 88.
Emery County Public Lands Department	Wild and Scenic Rivers	According to this paragraph on page 2-6, the goal of the BLM is to manage and maintain the integrity of "those segments determined to be suitable". The No Action Alternative describes Management of "eligible" segments.	It is not necessarily incorrect that the No Action Alternative is inconsistent with BLM's goals. In this case this particular goal would not be met by No Action since no decision would be made as to the suitability of eligible rivers. However, Since with the No Action Alternative no decision of suitability is made the BLM must ensure that all eligible streams are afforded protection until such time as a suitability determination is made. See GCRs 26 and 85.
Emery County Public Lands Department	Wild and Scenic Rivers	The discussion of "protective management" of eligible river segments needs to recognize the abundance of management layers in place which affords protection to the segments, including ACEC,s, SRMA,s, WSA,s Desolation and Gray Canyon Management Plan and most recently the Three Rivers Withdrawal.	The Proposed RMP/ Final EIS addresses how potential decisions for each alternative, including other protective designations, would affect the wild and scenic values (outstandingly remarkable values, tentative classification, and free-flowing condition) of each eligible river segment. The suitability considerations also recognize other means of protecting values of eligible rivers. Also see GCR 37.
Emery County Public Lands Department	Wild and Scenic Rivers	Section 2.11 No Action: Third paragraph states that river segments which have been found eligible would "remain eligible and be managed to protect their outstandingly remarkable values, free-flowing nature, and tentative classification…" This perpetual maintenance of 640 miles of river segments found not to be suitable for W&SR designation is unacceptable. It is not "no action", it is a new management strategy which creates de facto W&SR segments.	See GCRs 26 and 85.
Emery County Public Lands Department	Wild and Scenic Rivers	Section 2.14 Alternative C, Second paragraph. The determination to include all eligible segments as suitable in this Alternative is arbitrary. This determination is contrary to the statement made in 2.1 Introduction, which says the four alternatives were developed to present a "reasonable range of management options".	BLM Manual 8351.33C provides guidance for considering suitability in the range of alternatives. It specifies that "at least one alternative analyzed in detail shall provide for designation of those eligible river segments in accordance with the tentative classifications which have been made." What is imperative is that each eligible river is considered for suitability at least once within the range of alternatives so that the consequences of such a decision are fully analyzed. Alternative C represents one extent to this range.
Emery County Public Lands Department	Wild and Scenic Rivers	The DEIS states in 2.6 and 2.6.1, Summary of Five Alternatives, No Action Alternative, that "the No Action alternative represents current management, as outlined in the 1983 Price River MFP and the 1991 San Rafael RMP." In fact the 1991 San Rafael RMP determines that three segments on the Green River, four segments on the San Rafael River and six segments on Muddy Creek, a total of 184 miles, are eligible for inclusion in the Wild	The Draft RMP/EIS states in 2.6.1, Summary of Five Alternatives, No Action Alternative, "…as altered through amendment and policy…". This section was developed to give a quick look at each

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		and Scenic Rivers System. Therefore, the No Action Alternative (current management) in the PFO DEIS should be management of the segments on three rivers as eligible.	alternative. Section 2.11 of the Draft RMP/EIS summarizes the management of each Alternative. Section 2.6.1 of the Draft RMP/EIS has been replaced with a revised version of Section 2.11 and is now Section 2.2. BLM policy requires that once a Wild and Scenic River "eligibility" determination is made that the "No Action" Alternative must include protection of these segments. See GCRs 26 and 85.
Emery County Public Lands Department	Wild and Scenic Rivers	Determination of Outstanding Remarkable Values for Wild and Scenic River eligibility was done on a local basis without considering the relative values regionally as required…The region of comparison is, in effect, the region being considered. A better region of comparison would include the four corners area and Colorado River Basin.	See GCR 149.
Emery County Public Lands Department	Wild and Scenic Rivers	Although several dry washes have been eliminated from the list of eligible river segments, there are still a couple that remain in Alternative C and should not be determined suitable. Cane Wash, Coal Wash and North Fork Coal Wash are included on Emery County's GPS Roads Map 81104 which includes motorized travel routes. They are also recognized by the PFO as open motorized routes on the San Rafael Designated Route Plan. Emery County believes that an ATV route, or unimproved but highly traveled road is unsuitable for inclusion in the NWSRS.	See GCR 88.
Emery County Public Lands Department	Wild and Scenic Rivers	Designation of the seven segments of the Green River is in conflict with the purposes of the Colorado Compact of 1922.	Section 13 (e) of the Wild and Scenic Rivers Act clearly states, "Nothing contained in this Act shall be construed to alter, amend, repeal, interpret, modify, or be in conflict with any interstate compact made by any States which contain any portion of the national wild and scenic rivers system." This provides explicit assurance that any existing interstate compact, including the Colorado Compact of 1922, would have precedence over any action taken relative to the Wild and Scenic Rivers Act.
Emery County Public Lands Department	Wild and Scenic Rivers	Emery County believes designation of any segment of the San Rafael River in Alternative D would be devastating to the communities in the area. A portion of river or stream cannot be isolated from the rest of the river and be considered alone. Management decisions must be made by considering the whole river system, both up and down stream.	The BLM preferred alternative in the Draft RMP/EIS has been revised to create the Proposed RMP in the Proposed RMP/Final EIS. The suitability discussions, particularly for the San Rafael River, in Appendix C of the Proposed RMP/Final EIS more thoroughly address the manageability factors. Also see GCR 86.
Emery County Public Lands Department	Wild and Scenic Rivers	Designation of any of the streams and tributaries or drainage areas used as a municipal water source, as Wild and Scenic Rivers could result in assertions of minimum water flows. This could impact the water rights and water flows to the communities. This would result in a direct impact to their drinking water and municipal, and consequentially a severe impact on their socioeconomics, and maybe even detrimental to their existence.	Please see general comment response #86
Emery County Public Lands Department	Wild and Scenic Rivers	There is no interest from the counties, water users or energy companies to participate in funding efforts to manage any of these corridors as Wild and Scenic Rivers. The preferred alternative is objectionable to the extent it allows BLM to do interim protective management on tentative or potential segment designations. The preferred alternative is objectionable to the extent it urges, justifies or otherwise lends support to the unfounded notion that	Appendix C of the Proposed RMP/Final EIS is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river. The BLM preferred alternative

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		the water rights in the river segment somehow accrue to the BLM by virtue of a Wild and Scenic River eligibility or suitability determination.	has also been revised to create the Proposed RMP in the Proposed RMP/Final EIS based on these suitability considerations. It is BLM's policy, to the extent of its authority under the FLMPA, to protect the values which contribute to the stream's eligibility. FLPMA provides BLM with broad authority to manage the public lands including eligible/suitable river segments. Because Section 5(d)(1) of the Wild and Scenic Rivers Act requires that rivers be considered for wild and scenic purposes in planning, and because NEPA (40 CFR 1506.1) restricts actions that would limit the selection of alternatives, it is appropriate that BLM manage eligible/suitable rivers in a protective manner to protect values for possible Congressional designation. See GCRs 26, 85 and 86.
Emery County Public Lands Department	Wild and Scenic Rivers	ES-5 Wild and Scenic Rivers: The river segments found not suitable should then be managed absent of any Wild and Scenic consideration, not continue as perpetually "eligible", as the No Action Alternative states.	BLM Manual 8351.33C provides guidance for considering suitability in the range of alternatives. It specifies that "the no-action alternative, i.e., a suitability determination is not made, should provide for on-going management, including continuation of protective management of eligible segments." Because no decision of suitability would be made with the No Action Alternative, the BLM would ensure that all eligible streams are afforded protection until such time as a suitability determination is made. See GCRs 26 and 85.
Emery County Public Lands Department	Wild and Scenic Rivers	The lack of an alternative, which recommends no segments as suitable causes us to view the range of alternatives as incomplete.	Alternative A in the Proposed RMP/Final EIS has been change to find none of the eligible streams suitable for any Wild and Scenic River designation.
Emery County Public Lands Department	Wild and Scenic Rivers	Almost no consideration has been given to socioeconomic impacts of designation. Emery County asks that a complete socioeconomic study be completed which addresses impact of Wild and Scenic River designation.	A socioeconomic analysis of the impacts of the designation of wild and scenic rivers on neighboring lands has been added to the Proposed RMP/Final EIS.
Emery County Public Lands Department	Wild and Scenic Rivers	The No Action Alternative on P. 2-132, describes Protective Management of Rivers Potentially Included in the National Wild and Scenic River System for all river segments found "eligible".	See GCRs 26 and 85.
Emery County Public Lands Department	Wild Horses and Burros	Wild Horses and Burros: Most permittees recognize that some herd management (HMA's) need to be maintained for wild horses in order to conform to the Wild Horse and Burro Act of 1971. We therefore recommend that wild horse HMA's be kept strictly within the numbers as indicated in the no-action alterative and that the Sinbad allocation not be transferred to the Muddy Creek allotment as proposed in Alternative D.	Maintaining wild horse and burro populations at the AML is accomplished through periodic gathers as directed by law and regulation. BLM actively implements gathers to maintain wild horse and burro populations at approved AML. Implementation of gathers is governed nationally,

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			based on the number of horses in the wild horse system. Individual Field Offices can plan for removals, but actual removals are approved by the Washington Office before herds can be reduced. Consolidation of the Muddy Creek HMA with the portion of the Sinbad HMA that has horses in it would not increase the number of wild horses in the area, but would simply redraw the boundaries to more accurately reflect wild horse population interactions.
Emery County Public Lands Department	Wilderness	1.6.14, Non-WSA Lands With or Likely to Have Wilderness Characteristics: This section is misleading and not consistent with the settlement in Utah v. Norton and directives related to it. A brief description of the settlement terms should be in the opening paragraph of this section. This would provide the reader with an answer to why the BLM won't consider designations of new WSAs in the RMP process.	See GCR 146.
Emery County Public Lands Department	Wilderness	The DEIS employs concepts of ACEC, VRM, SRMA to eliminate or unreasonably discourage previously accepted and established patterns of resource extraction and associated surface occupancy. The preferred alternative would effectively place for the first time, large tracts of public land under a de facto non-impairment mandate.	Under FLPMA's multiple-use mandate and the requirements of other federal laws, the BLM manages many different resource values and uses on public lands. Through land use planning BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. Under the multiple-use concept, the BLM does not necessarily manage every value and use on every acre, but routinely manages many different values and uses on the same areas of public lands. The BLM strives to ensure that the goals and objectives of each program (representing resource values and uses) are consistent and compatible for a particular land area. Inconsistent goals and objectives can lead to resource conflicts, failure to achieve the desired outcomes of a land use plan. The goals and objectives of the alternatives analyzed in detail are explained in Chapter 1 of the Proposed RMP/Final EIS and the impacts of the decisions of each alternative are analyzed in Chapter 4. These impacts were considered during development of the Proposed RMP. Also see GCR 37.
Emery County Public Lands Department	Wilderness	The ACEC, VRM, SRMA, ROS and Wild and Scenic River concepts are tools to be used only within the context of and consistent with, the multiple use sustained yield mandate of FLPMA as well as the mineral resource development and extraction mandate of local county plans. These concepts are not to be used as excuses to de facto manage public lands as if they are or may become WSA's. FLPMA and the April 2003 Wilderness Settlement Agreement mandate that the Secretary not "establish, manage or otherwise treat public lands, other than Section 603 WSA's.	See GCRs 108, 116, and 141.

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Emery County Public Lands Department	Wilderness	The term "Or likely to have" should be struck from the title. Neither the settlement not IM-2003-274 or IM 2003-275 provides for the management of such land to preserve some or all of these values as presented in the first paragraph. it is easier to understand that either land has these characteristics or it doesn't.	See GCR 116.
Emery County Public Lands Department	Wildlife and Fish	Page 2-43: Alternative D states "…seasonal closures for surface disturbing activities within all crucial habitats…", and the Table of Chapter 4, P. 4-157, "…seasonal closure for motorized vehicles in crucial wildlife area" is inconsistent with Appendix 16, "Areas where stipulations apply", indicates crucial and high value areas. Also, Table on P. 4-184 where closure is in crucial habitat only, is inconsistent. Some kind of consistency must be developed.	These inconsistencies have been resolved in the Proposed RMP/Final EIS. Appendices 8 and 16 of the Draft RMP/EIS have been combined into Appendix G where it is clarified that restrictions are for "crucial" or "crucial and high value" habitat across the various Alternatives.
Emery County Public Lands Department	Wildlife and Fish	Reintroduction of, or increased populations of big game by Utah Department of Wildlife Resources (UDWR) should not be supported by BLM in this Resource Management Plan unless UDWR acquires additional forage or habitat. This increase of population should only be considered when it does not interfere with livestock forage allocations. No alternatives address these issues.	See GCR 8. The Proposed RMP/Final EIS analyzes the general impacts of introductions or reintroductions. The specific impacts of introductions or reintroductions will be addressed in project specific NEPA analyses that will address the County's concerns.
Emery County Public Lands Department	Wildlife and Fish	Seasonal closure (time restriction) for deer and elk calving and fawning is indicated, not NSO, as represented in Appendix 8.	See GCR 41.
Emery County Public Lands Department	Wildlife and Fish	Alternative B, in Appendix 8, is actually much more restrictive than the No Action alternative and more restrictive than intended due to the cumulative effects of overlapping species habitat. Emery County suggests that there be an expectation and schedule to develop a procedure to waive or modify seasonal closure stipulations when the cumulative impact of the collective stipulations for different species would significantly hamper the development of oil and gas.	See GCR 41.
Emery County Public Lands Department	Wildlife and Fish	General assumption in all alternatives that wildlife will benefit from relinquishment of grazing permits: This assumption does not have a basis of science and there are some detrimental affects to wildlife that are not discussed. The primary failure is the fact that the primary developer of water sources such as ponds and springs is the Grazing Community. In many cases, livestock ponds are the only source of water in miles and the removal of permits will remove the incentive to maintain and develop these sources.	See GCR 82.
Emery County Public Lands Department	Wildlife and Fish	A number of operation and maintenance activities which may not meet BLM's definition of casual use activity should be able to be conducted during seasonal restrictions. Some examples are work over rigs, building repairs, equipment repairs, pipeline repairs, moderate excavation, road grading and snow removal which are clearly maintenance activity associated with the well be allowed in this RMP during seasonal closures. We believe that restriction of initial drilling and construction activities accomplishes the desired effect of minimizing the disturbing activities associated with oil and gas wells. Maintenance activities will have only modest, localized impacts on wildlife populations.	See GCR 42.
Emery County Public Lands Department	Wildlife and Fish	Riparian Areas: Alternative D proposes NSO within 330 feet of intermittent or perennial streams, and NSO on the 100 year floodplain of the streams. This is more restrictive than the other alternatives.	In the Draft RMP/EIS Alternative C is the most restrictive imposes the buffer around intermittent or perennial stream. Alternative D is less than Alternative C.
Emery County Public Lands Department	Wildlife and Fish	Appendix 8, Alternative D, "Spatial and Seasonal Wildlife Conservation Measures": The Alternative uses No Surface Occupancy (NSO), restrictions extensively. More so than in Alternative C, which is the "maximum conservation" alternative. Alt C specifies seasonal restrictions. This is inconsistent with tables in chapters 2 and 4. These tables would indicate seasonal closure, not NSO.	See GCR 41.

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Emery County Public Lands Department	Wildlife and Fish	Habitat for white footed prairie dogs and neotropical birds are not active habitat issues in the PFO and should not be the basis for spatial nor seasonal restrictions.	No spatial nor seasonal restrictions contained in Appendix G are related to these species.
Emery County Public Lands Department	Wildlife and Fish	There doesn't appear to be any process for exception, modification, and waiver for habitat designated NSO in Appendix 8, “Spatial and Seasonal Wildlife Conservation Measures” and Appendix 16 appears to offer these processes only for seasonal closures, not for NSO designations. We suggest that if any habitat is designated NSO, then Proposals to increase areas of seasonal restrictions for mule deer and elk by including substantial and limited value habitat as well as critical and high-value habitat is inconsistent with achieving optimum multiple use development.	See GCR 41.
Emery County Public Lands Department	Wildlife and Fish	Appendix 8, What is the need for “ Raptor Cliff Nesting Complexes” when there is the “Known Nest Site” entry? The latter is adequate to manage nesting sites. Current management is the best management practice and further defined habitat is unnecessary.	See GCR 41.
Emery County Public Lands Department	Wildlife and Fish	There are substantial inconsistencies between Appendices 8 and 16. Also timing limitations are preferred to no surface occupancy for big game.	The inconsistencies between Appendices 8 and 16 in the Draft RMP/EIS have been resolved in Appendix G of the Proposed RMP/Final EIS. Also big game restrictions are now seasonal. See GCR 8.
Emery County Public Lands Department	Wildlife and Fish	The high-value breeding habitat of neotropical birds needs to be shown on a map. Please provide a map showing the breeding habitat (high-value or otherwise) of these birds.	No neotropical birds map has been included in the Proposed RMP/Final EIS because there are no spatial nor seasonal restrictions contained in Appendix G related to these species.
Emery County Public Lands Department	Wildlife and Fish	There is no white-tailed Prairie Dog habitat represented on any map, specifically the “Crucial” habitat referred to in the Table.	Map 3-14, White tailed prairie dog habitat, has been added to the Proposed RMP/Final EIS.
Emery County Public Lands Department	Wildlife and Fish	Appendix 8, Pronghorn: the NSO designation under Alternative D is excessive when compared with the other alternatives. We suggest that the RMP should direct the seasonal restriction or other best management practices be adopted to protect pronghorn fawning habitat, rather than NSO.	Pronghorn restrictions have been removed from Appendix G of the Proposed RMP/Final EIS because the fawning seasonal restriction was less than 60 days and BLM has discretion to move oil/gas pads without a stipulation.
Emery County Public Lands Department	Wildlife and Fish	Appendix 8, Bighorn Sheep: The NSO designation under Alternative D is excessive when compared with the other alternatives. We suggest that the RMP should direct the seasonal restriction.	Appendix G of the Proposed RMP/Final EIS has been revised making the Bighorn Sheep restriction seasonal instead of NSO.
Emery County Public Lands Department	Wildlife and Fish	Appendix 7, Raptors, Protection of Nest Sites and Buffer Zones, Unoccupied Nests: The seven-year nest monitoring period for unoccupied nests seems to be a new requirement. Does this imply that if the next becomes occupied during any time during the seven year period that any surface structure would have to be removed? The current practice of a three-year monitoring period should be continued a seven year period is excessive.	Appendix F has been replaced with a 2006 version of the raptor guidelines in the Proposed RMP/Final EIS. This appendix has a three year requirement and not a seven year.
Emery County Weed and Mosquito Dept	Vegetation	It is position of the Emery County Weed Department that the management plan to be adopted should facilitate, not hinder or restrict any effort to protect our natural resources from invasive species as long as those efforts are based on sound scientific procedures. The wording of 2.7.3.1 must be expanded to recognize that there are already in place invasive species not listed on the state and county noxious weed lists that are destroying biodiversity of the area.	One of BLM's goals denoted in Section 2.2.3 of the Draft RMP/EIS is to "Control noxious and invasive weed species and prevent the introduction of new invasive species." BLM's goal is reflected under Common To All Alternatives in Section 2.7.3.1, Noxious/Invasive Weed Management which does not imply a restriction for administrative access. Section 2.5.1 refers to access for the general

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			public, whereas noxious and invasive plant prevention and control can be completed with administrative access. The wording in Section 2.7.3.1 does not restrict management of invasive species to only those provided on State and County noxious and invasive weed lists.
EOG Resources, Inc.	Air	The air quality planning "objective" identified in the RMP is to ensure BLM authorizations and management activities comply with all applicable regulatory authorities (page 2-2); however, the BLM has no regulatory authority with respect to enforceable air quality standards. The BLM can, however, provide approval for the construction of facilities that contain emissions-generating equipment. Permit review and air quality standards that must be met would be provided by the State of Utah, which has primacy of the administration of the Clean Air Act within its borders. The goal as identified in the DEIS is beyond the authority of the BLM.	The objective as written is acceptable. Although the BLM does not have regulatory authority for air quality, it can not knowingly approve an activity on public lands that will violate any other Federal Law including the Clean Air Act. The BLM also has the responsibility under NEPA to disclose the potential air quality impacts of a proposed action.
EOG Resources, Inc.	Air	The air quality analysis provides no quantitative basis for its conclusions. Impacts to air quality under Alternatives A and B are described as being the same, including locally significant increases in pollutant emissions resulting from CBNG development. Impacts to air quality resulting from the implementation of Alternatives C or D, however, are described as being not significant, with no rationale provided for why the significance of the impacts would differ among the alternatives. The number of wells projected under each alternative is similar, and therefore, the impacts to air quality should also be similar.	The air quality impacts section of the Proposed RMP/Final EIS has been revised. It now references the AQBR 2008 and summarizes air quality emissions by alternative.
EOG Resources, Inc.	Air	When referring to fugitive dust generated by county maintenance of roads, the analysis defers responsibility to the county, thus avoiding the purpose of the NEPA document to analyze all impacts, including direct, indirect, and cumulative impacts.	Only an increase in traffic attributable to the RMP would normally be considered in the analysis. The existing monitoring data would account for the existing environment and hence, current traffic.
EOG Resources, Inc.	Cultural Resources	• No short-term disruption to cultural resources would result from visual or auditory events. Cultural resources are not living entities that would notice if traffic levels, for example, were increased. Adverse effects to recreational users who may be in the area to observe or study the cultural resources could, however, result in visual or auditory variations from the norm that may be considered adverse effects. • The DEIS contains no discussion of traditional cultural properties, despite the fact that thousands of archaeological sites have been identified and thousands more probably exist in the planning area (page 3-19). • It is unclear whether Native American consultation has taken place during the preparation of the DEIS. Lack of consultation is a significant omission.	The DEIS states that auditory and visual impacts can affect cultural landscapes or traditional uses. The Proposed RMP/Final EIS does address Traditional Cultural Properties in Chapters 2 and 4. BLM has made an extensive effort to consult with Native American Tribes that may have ties to the Price planning area. BLM began during scoping to identify concerns of Native Americans. Meetings were held and the draft RMP/EIS was released to the public and sent to Native American Tribes. Follow-up visits have been made to tribes who requested them. Consultation will continue throughout the process. Chapter 5 of the final EIS has been updated to reflect all consultation.
EOG Resources, Inc.	Lands and Realty	One goal of the Lands and Realty analysis is to acquire non-federal lands where needed to accomplish important resource management goals (page 2-16). The EIS does not address how such acquisitions would be accomplished if the minerals have already been leased by the State.	Land acquisitions can be for either surface estate, mineral estate, or both as evidenced in the BLM/State of Utah Exchange of 1999.

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			Valid rights were recognized in transfer of ownership.
EOG Resources, Inc.	Lands and Realty	The discussion of multiple pipelines in a single or overlapping rights-of-way (ROWs) is confusing. In order to reduce or minimize surface disturbance, linear ROWs that are created for pipeline installation, for example, are often granted adjacent to each other, may overlap, or are adjacent to existing/proposed roads.	The alternatives analyzed in the Proposed RMP/Final EIS include 1 mile-wide corridors for major linear ROWs. The layout of rights-of-way within the corridors would depend on the types of utilities placed in the ROWs and the required spacing for safe operation and maintenance. These factors would be considered at the time specific projects are analyzed.
EOG Resources, Inc.	Minerals and Energy Resources	The Mineral potential Report for Price Field Office, Carbon and Emery Counties, pp.: Utah and the Fluid Mineral Reasonably Foreseeable Development (RFD), Appendix 21 to the DEIS contains insufficient data to accurately predict oil and gas development during the next 20 years. The rationale is described below: • Oil and gas operators should have been allowed to cooperatively develop the RFD with the BLM and should have been able to review the RFD after it was developed. A cooperative effort would have ensured RFD consistency with development plans by operators in the planning area. • Data obtained from oil and gas operators would have provided accurate data for use in developing assumptions used in the RFD/DEIS. At a minimum, the figures used to estimate future surface disturbance should have been submitted to the operators for verification and concurrence. • In order to estimate the requirements for take-away capacity that would have corresponded to the operators' expected level of development, the BLM should have entered into cooperative discussions to project an appropriate scenario of take-away capacity sufficient to accommodate future operations. Projections for adequately sized trunk line capacity should have been related to economic projections and energy needs for the planning area and the nation with additional detail. • The RFD does not quantify the need for well site compression, presumably because the power source for well site compressors is assumed to be electricity. The assumption that well site compression would be powered by electricity in most cases may be misleading as leased areas grow and supporting infrastructure is limited. The analysis in the DEIS does not include the possible use of generators. • The RFD does not include a discussion of well life in the planning area and does not attempt to relate the number of wells drilled prior to the implementation of the RMP to the number that would be abandoned during the planning period. An estimate of wells that would be abandoned within the time frame of the planning period should be quantified so that the respective percentages of new and existing wells are made clear in the document. • The RFD and DEIS should have included an estimate of central compression and other gas processing needs required for future production in addition to a discussion of the amount of existing compression. Estimates of the number and types/horse power of compressors currently in use and projected for future production needs should have been determined through discussions with planning area operators and pipeline/gas transmission	Please see general comment response #53

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		companies. • Production increases are expected to come primarily from coalbed natural gas (CBNG) production in the planning area during the 20-year planning scenario. CBNG development is extremely sensitive to gas pricing and demand. The BLM should have accounted for an increased level of CBNG development within the planning area that may result from fluctuating market influences and increased market demand. • The ability to utilize more innovative drilling and completion techniques over the next 20 years may increase future gas production quantities, triggering a re-examination of spacing rules for the CBNG-producing formations in the planning area and increasing the number of future wells. The lack of precise information regarding the potential CBNG bearing formations beneath the planning area results in an inadequate analysis of future production potential. Coal characteristics, regional geology, and infrastructure all define the characteristics of a particular CBNG play. • The Mineral Potential Report provides an "intermediate (page 1)" level of detail; however, the document is written so broadly that EOG is unable to find substantiation for the figures presented in Table 4-2, Price Minerals Reasonable Foreseeable Development" in the DEIS. Moreover, an intermediate level of detail is insufficient to project definitive well numbers over a 20-year period, thereby possibly constraining oil and gas operations by underestimating the level of future development. • The Mineral Potential Report states that "coal and coalbed methane resources have the highest potential for future development (page ES-1)." The EIS, however, analyzes CBNG as the activity that would result in the greatest surface disturbance, and, thus, it would be the cause of the greatest impacts to other resource values. If the extent of coal development is undetermined, impacts resulting from coal mining may not necessarily be less than those associated with CBNG development • The terminology in the Mineral Potential Report describing occurrence potential and level of certainty is confusing and difficult to follow. The abbreviations used are not precisely defined in a way that provides the reader an intuitive understanding of the content of the text. • Areas of high and low oil and gas occurrence potential, each associated with level of certainty, were described in the Mineral Potential Report This report provides no basis for determination other than a USGS national assessment conducted in 1995 (page 74). The degree of certainly is ascribed to a time period of 15 years. No basis was given for the time frame selected. The RFD should describe what would occur during the full 20-year time frame of the RMP. • The Mineral Potential Report does not explain the relationship of the designation of Wilderness Study Areas (WSAs) and Areas of Critical Environmental Concern (ACECs) to oil and gas drilling and development although attention is given to these types of special management areas in the report. It can be inferred that some impacts to oil and gas development would result from the designation of such areas, and, in fact, the effects are somewhat explained in the DEIS. CBNG is being extracted from deeper and deeper formations as the price of natural gas continues to rise. Stating that much of the nation's coal deposits lies at relatively shallower depths (Mineral Potential Report, page 28) may be accurate; however, the extraction of CBNG from reservoirs that do	

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		not lie close to the surface cannot be precluded. • The Mineral Potential Report states that the delineation of coal plays and fields are in a state of flux and are being expanded. The report states (page 73) that the Emery (Ferron) play alone could support approximately 3,400 CBNG wells. The RFD, as summarized in Table 4-2 in the DEIS estimates a maximum of 900 CBNG wells drilled in both the Emery and Book Cliffs plays and 1,900 wells total in the planning area under Alternative A, an estimate far below the projection for CNBG wells alone. • The RFD does not include all components of the Policy for Reasonably Foreseeable Development Scenario, as described in Instruction Memorandum No. 2004-089 issued by the BLM on January 16, 2004. The omissions include: an analysis of economic factors that may affect oil and gas activity; bid performance at lease sales; physical limitations affecting surface access; and produced water disposal issues, including the drilling of disposal wells.	
EOG Resources, Inc.	Minerals and Energy Resources	Alternatives Development: • EOG contends that the alternatives developed for the DEIS do not offer the public, including the oil and gas industry and other users of public lands, clear-cut, distinct resource management choices. The distinction between Alternatives B and D is not made clear by the descriptive text that accompanies each of these alternatives. Alternative B is designed to balance uses. Alternative D is designed to provide for a wide variety of resource needs. Alternatives B and D are described as being "similar" with respect to maximizing mineral development potential. The text describing Alternative D continues to say that mineral development potential would be maximized in areas with the greatest potential for recreation development, like Alternative B. The only way to determine the difference between these two alternatives with respect to oil and gas development was to study Table 4-2 in the DEIS. • Although Alternative B is purported to "balance" uses within the planning area, lands that would be designated as open to leasing under the terms and conditions of the lease form would total "zero." With respect to leasing, Alternative D exhibits a more "balanced" perspective in that 47% of the lands available for leasing would be leased subject to the terms and conditions of the lease form while 23% would be leased with additional minor constraints. • The designation of approximately 22% and 23% of the planning area lands as closed to leasing under Alternatives B and D is an unacceptably large percentage of the amount of land within the planning area. To deny development of the mineral resource in nearly one-quarter of the planning area does not support the BLM's mandate of multiple use under the Federal Land Policy and Management Act of 1976. Approximately half of the lands that could be closed under Alternatives B and D lies in areas described by the BLM as having high mineral development potential. • Alternative B was developed to balance responsible mineral resource development with the protection of other resource values (DEIS, page 2-5). This "balanced" alternative would essentially mean precluding oil and gas development on existing nonfederal leases contained within BLM-administered lands proposed for protection. The balance is not discernable to EOG, which owns State leases within areas proposed as ACECs by the BLM and would be closed to development.	BLM has supplemented Chapter 4 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 EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities for OHV use and mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of OHV use and mineral development. BLM recognizes valid existing rights and stipulations or closures proposed in the FEIS would apply only to new leases.

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		• 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. These leases are surrounded, for the most part, by the Turtle Canyon and Desolation Canyon WSAs. EOG supports the release of the Turtle Canyon and the Desolation Canyon WSAs from interim management policy and its management as part of the Desolation Canyon SRMA, as described in Alternatives B and D. As stated in the DEIS, such action would open some areas to oil and gas leasing and may facilitate access to EOG's leases of the State-owned sections within the area. Alternatives B and D would, however, also close the area that has been designated as the Turtle Canyon WSA to leasing by including the area in the proposed Range Creek ACEC. Accessibility gained by opening up some areas of the Turtle Canyon WSA would be denied under the same alternatives. Alternative B would also designate the Beckwith Plateau, immediately to the south of EOG State leases, as an ACEC to be closed to oil and gas leasing and designated an avoidance area for ROWs. To open an area to leasing under one aspect of an alternative and close it to leasing under another aspect of the same alternative is inconsistent and implies a lack of a clear sense of management direction and focus. • A comparison of Map 3-21 (Conventional Oil and Gas Occurrence Potential) with Maps 2-28, 2-29, 2-30, and 2-31(Fluid Mineral Leasing under Alternatives B, C, and D) shows that large areas in the eastern portion of the planning area that display a high potential occurrence of conventional oil and gas would be closed to leasing. The affected area includes T17 and T18S, R16E. Under the No Action Alternative, this area is currently open to leasing with minor constraints. 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 in an area of high potential and is thereby not consistent with the Energy Policy and Conservation Act Reauthorization of 2000. • Although the DEIS states that the State of Utah and the Price Field Office must coordinate planning efforts (DEIS, page 1-13), the inclusion of State lands with previously granted oil and gas leases within areas of limited or no access does not reflect a coordinated effort. Specifically, lands that are currently surrounded by WSAs and are bordered, at least on the north side, by proposed ACECs that would limit access.	
EOG Resources, Inc.	Minerals and Energy Resources	• Maximizing mineral development potential in areas where recreation potential is also maximized (Alternatives B and D) may present user conflicts. Not all recreationists care to participate in recreational activities in and around areas where oil and gas development is taking place. Furthermore, intensive use by either oil and gas operators or recreational users in any specific area may result in hazards to public health and safety.	Please see general comment response #18
EOG Resources, Inc.	Minerals and Energy Resources	• The lack of direct access to non-federal leases within the planning area may disallow the development of leases where access is limited by NSO constraints. Although directional drilling is often considered to be the solution to producing minerals from leased acreages where the surface is restricted from use, it is not likely to be considered a realistic solution in most cases. The use of directional drilling to develop subsurface leased minerals depends on site-specific geological conditions that would vary throughout the planning area. The use of alternative drilling technologies, including directional drilling, should not be presumed to be feasible on anything. but a well-specific basis. The use of directional drilling or any other non-conventional type of drilling or production technique cannot be presumed to be able to access minerals in those areas where operations are excluded or restricted. An operator's inability to extract minerals from its leases is a denial of the rights associated with lease acquisition and could be construed as a taking. BLM Instruction Memorandum 92-67 clarifies 43 CFR 3101.1-2, provides for a 200-meter general standard within which surface-use restrictions must fall. For any surface-use restriction that exceeds the 200-meterl60-day rule, the BLM bears the burden of establishing that the restriction is justified.	Please see general comment response #16

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		• Technical constraints also limit the use of directional drilling to produce leased mineral resources. For example, CBNG is typically produced with large amounts of water. Installing pumps in order to successfully remove water from deviated well bores is difficult. • Although the analysis (page 4-454) acknowledges that the distance between where a well's surface location and the intended bottom hole location may be too "wide" (the BLM probably means that the offset distance is too "great"), there is no reference to depth to the producing formations, another critical factor in determining whether directional drilling may be a viable option. • Even if directional drilling were considered feasible, directionally drilled wells present challenges not typically encountered with vertical wells: directional wells require a longer period of time to drill, increasing drilling costs associated with additional man-hours; additional drilling costs would result from the use of specialized directional drilling equipment with which to monitor well bore location; the increased drilling time presents an increased exposure to potential problems associated with drilling in general; and severe problems could render a well uneconomic to produce or could result in the loss of the well bore. • The analysis in the DEIS does not consider what fraction of the available oil and gas resources would be unrecoverable due to lack of access to the surface above the lease.	
EOG Resources, Inc.	Minerals and Energy Resources	• The analysis on page 4-452 lacks coherence and fails to make a point. If prioritization of land use according to types of energy resources is the issue, the point can be made that proper, sensible prioritization can be developed in order not to waste some quantities of the competing energy resources (such as CBNG and coal development).	Please see general comment response #122
EOG Resources, Inc.	Minerals and Energy Resources	In areas where conflicts may arise as a result of coal deposits being located near gas or CBNG resources, development priority should be given to the drilling and production of natural gas rather than coal mining. Coal mining can result in the loss of the gas resource when coal beds are exposed to the surface during surface mining operations. If gas is extracted prior to the coal being mined, the gas resource is not lost to the atmosphere and would not be considered a waste.	Please see general comment response #122
EOG Resources, Inc.	Process and Procedures	Section 4.1.2 does not include definitions of the context and intensity of impacts that would allow the public to evaluate each impact in terms that would ensure consistent interpretation of the magnitude of the impacts. Also, the determination of the magnitude of impacts is not defined in a way that would ensure consistency among the different resources and resources uses evaluated.	Planning analysis is broad and of necessity more qualitative than analysis of a well defined site-specific proposal with a quantifiable footprint. Analysis in the Proposed RMP/Final EIS is based on reasonably foreseeable impacts from reasonably foreseeable actions and is quantified to the extent possible based on the assumptions provided in the EIS.
EOG Resources, Inc.	Process and Procedures	The DEIS states that best management practices (BMPs) would be applied to all new and existing oil and gas leases (page 2-18); however, the DEIS does not define the BMPs.	A suite of techniques that guide, or may be applied to, management actions to aid in achieving desired outcomes. Best management practices are often developed in conjunction with land use plans, but they are not considered a land use plan decision unless the land use plan specifies that they are mandatory. They may be updated or modified

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			without a plan amendment if they are not mandatory. In the Proposed RMP/Final EIS Appendix G provides stipulations for surface disturbance that are considered best management practices along with criteria for exceptions, modifications and waivers. Best management practices for raptors are described in Appendix F. Appendix S identifies environmental best management practices that may be applied on individual Applications for Permit to Drill and associated rights-of-way in the Price Field Office on a case-by-case basis.
EOG Resources, Inc.	Recreation	The analysis of impacts to recreation (page 4-449) fails to recognize that increased fugitive dust and traffic resulting from oil and gas activities would not only be short-term but would also be localized to the construction site. The analysis of impacts to recreation fails to acknowledge that in areas that are designated as No Lease areas, the pre-existing lessee would retain existing lease rights.	Fugitive dust is not necessarily restricted to the construction site. Dust created on roads used by vehicles accessing the mineral development site could also cause an impact to recreational users of the same roads. The assumption for analysis (stated on page 4-419) for minerals states that valid existing leases would be managed under the stipulations in effect when the leases were issued. Thus pre-existing lease rights would be retained and honored.
EOG Resources, Inc.	Socioeconomics	• The DEIS lacks a discussion of socioeconomics. Many rural areas throughout the western U.S. depend on the extractive industries to support local economies. By omitting a discussion of economic impacts to communities in the planning area, the DEIS fails to recognize the importance that the oil and gas industry may play in local economic viability and stability.	See general comment responses #2 and #132
EOG Resources, Inc.	Soil, Water and Riparian	• The soils analysis incorrectly states that the construction of ditches for pipelines would result in long term impacts to soils, water, and riparian areas. Pipelines are either constructed on the surface requiring no excavation, or are buried in trenches that are immediately reclaimed. Disturbance resulting from construction of buried pipelines is typically considered short-term disturbance. • As a result of implementing the stipulations contained in Stipulations to Surface Disturbing Activities (Appendix 16), satisfying State of Utah storm water pollution prevention requirements, and implementing BLM site-specific conditions of approval to minimize erosion and sedimentation, there would be little to no impacts to soils. To state that by closing areas to oil and gas development, soils and water would receive long-term benefits is absolutely false. There would be some loss of the soil resource as a result of surface disturbing activities; however, topsoil is set aside, protected, and stabilized for reclamation activities, some of which occur immediately after the well is put on production. The DEIS estimates that approximately 36% (page 4-437) of the amount of initial surface disturbance would remain as long term disturbance. The remainder would be reclaimed shortly after construction and facility installation. Most of the predicted eroded soil would be contained on-site and would not be transported	The mixing of soil horizons from the extraction and subsequent refilling would create long term changes to the local soil profile. Removal or destruction of biotic crusts would also cause long term impacts to the soil creating increased potential for erosion. Implementing the stipulations contained in the Appendix 16 (incorporated into Appendix G of the Proposed RMP/Final EIS) would avoid or otherwise mitigate the effects of disturbance. The determination as to whether an impact is “long-term” or “short-term” is subjective. The exact time that a reclamation effort may be completed and deemed successful depends on climatic factors as

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		off-site.	well as soil types and reclamation methods. This would hold true for whatever disturbed area is being reclaimed (pipeline corridors, well pads, roads). The DEIS points out that oil and gas development would cause impacts (long-term or short-term) to soils, water and riparian. The determination as to whether an activity has “little” or “no” impact is subjective. Soil disturbing activities have an impact on soils even with mitigating measures being implemented. The determination as to whether an activity is “beneficial” or “detrimental” is subjective. Lack of surface disturbing activities in an area through closures or restrictions may benefit soils, water and riparian areas if such surface disturbing activities would cause accelerated erosion, water depletion or riparian area degradation.
EOG Resources, Inc.	Vegetation	• The discussion of impacts to vegetation resulting from oil, gas, CBNG, and combined hydrocarbon leasing incorrectly includes effects relating to the withdrawal of areas from locatable mineral entry and mineral materials disposal.	Please see general comment response #163
EOG Resources, Inc.	Visual Resources	The DEIS does not relate potential impacts to visual resources to VRM classifications in various parts of the planning area. Mitigation measures would vary according to the VRM classification of the area where development is taking place. Not all mitigation measures provided as examples in the discussion on page 4-442 would be applied universally throughout the planning area.	The discussion of VRM impacts and mitigation measures has been revised. Section 4.2.6 of the Proposed RMP/Final EIS states that surface disturbing activities and facilities would be designed to mitigate their visual impacts and conform to the area's assigned visual resource management objective.
EOG Resources, Inc.	Wildlife and Fish	• The analysis under Alternative B incorrectly states that "no land would be designated open to leasing (page 4-443)." o The analysis states that maintenance and operation of oil and gas facilities would have an adverse effect on wildlife populations, negatively affect reproductive success and viability of the young, and reduce winter survivability due to stress. The analysis did not substantiate any of these assertions with documentation. Further, EOG contends that adverse effects such as those described in the DEIS are speculative as described. If adverse effects to wildlife were to result from oil and gas development, it would likely be species-specific. The DEIS made no distinctions among species with respect to these supposed impacts. For example, summer survivability due to drought conditions may have more of an adverse impact to species viability than an intermittent and small increase in traffic that may result from maintenance and operation of oil and gas facilities.	Please see general comment response #42
EOG Resources, Inc.	Wildlife and Fish	The following comments are directed to the analysis of impacts to raptors. The DEIS states that known raptor nests would be closed seasonally (Appendix 16, Stipulations to Surface Disturbing Activities), unnecessarily	Please see general comment responses #41, #59 and #60

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		preventing development near inactive or abandoned nests. Rather than closing the nest itself, a buffer distance would set definitive usage guidelines for the area surrounding the nest. EOG supports this measure as long as operators are able to access their wells. Denying access to producing wells would prevent an operator's ability to perform routine maintenance and ensure that wellsite equipment is functioning properly. Road closure could result in unsafe conditions. EOG suggests that if a raptor establishes a nest that may possibly be impacted by vehicular traffic, use of the road should be prohibited to general public use but not to operators. Operator vehicle trips to producing wells would be minimized.	
FAF Management	Alternative Maps	The DRMP needs more proficient cartographic representations. There is much room for error in discussion since the precise geographical boundaries are difficult to ascertain for the non-specialist.	Please see general comment response #32
FAF Management	Process and Procedures	The document needs to address the enforcement resources required by the draft plan. Tax payers will be incurring the financial burden of enforcement, management, and remediation, therefore the document needs to project those anticipated expenses in a predictive statement. Furthermore, during one of the DRMP presentation meetings, your staff articulated that the BLM is as much as 10 years behind - in posting signage. How do you anticipate being able to over come the power curve and apply not-yet-existing resources to a sweeping reform plan that is several years behind even in the drafting process? This needs to be addressed clearly and authoritatively.	Please see general comment responses #15 and #147
FAF Management	Socioeconomics	I expect that you will remedy the currently insufficient socio-economic impact study. I am confident that I do not need to list the deficiencies, nor restate the prevailing requirements to conduct a thorough and competent study.	See general comment response #132
Findlay Wellsite Supervision	Wildlife and Fish	One of the reasons stated for restrictions was the decline of the Mule Deer population in the area. Why then was there so many hunters in 9-Mile in Oct? Is the Mule Deer under the jurisdiction of the State of Utah or the BLM?	Please see general comment response #8
Flying J Oil & Gas	ACEC	We strongly disagree with ACEC status for the Nine Mile Canyon and Range Creek areas and urge you not to grant Visual Resource Management Class II status where existing or future development will or may occur.	Please see general comment response #30
Flying J Oil & Gas	Minerals and Energy Resources	The area covered by the draft RMP/EIS contains critically needed oil and gas resources which can be responsibly developed.	Please see general comment response #18
Forest Ridge Trail Riders	OHV Route Identification	We understand the DRMP/DEIS has many management layers which make the travel rules for lands in each SRMA as well as ERMA virtually impossible to understand. We ask that you streamline and accurately disclose which roads and trails will be open to motorcycles in each alternative. How will each alternative alter the San Rafael Travel Plan? Please clarify. We oppose any road and trail closures. In fact, the increased popularity of our sport simply demands more areas to be opened. That way, we all can enjoy the beauty of scenic areas, rather than an over used areas subject to closure... Do you intend to keep open the popular Chimney Rock/Summerville trail? This is not clear but it should be kept open as is the case with dispersed camp sites. There is no justification for these limits outlined in Alternatives A through D.	See general comment responses #19, #20, #31 and #37.
Forest Ridge Trail Riders	OHV Route Identification	As a small non-profit group we support trail maintenance volunteers, "good will rider" programs, Tread Lightly, etc. etc. We ask that you reconsider the group size limits and stay with the 50 vehicle size.	Please see general comment response #81
Forest Ridge Trail Riders	Process and Procedures	Our group does not support overly restrictive and impossible to understand restrictions on our recreation on our public lands. We oppose the management 'layers' outlined in the draft plan because of restrictions not warranted and impossible to understand and comply with. Please do your job and MANAGE our public lands for everyone to enjoy instead of limiting to a select few or closing for no use. With common sense and more trails it can be done.	Please see general comment response #37
Friends Cmte On Unity	Recreation	I urge you to move quickly to implement the recommendations of that plan [the 1995 Nine Mile Canyon Cultural	Please see general comment response #117

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with Nature		and Rerecreational Plan], which could help control increased recreational use, and protect cultural resources while simultaneously enhancing the interpretive experience for the public. -Develop an interpretive plan for Nine Mile Canyon that emphasizes public education about prehistoric and historic resources. -Develop signs for visitors that provide cultural interpretation and emphasize the importance of refraining from actions that might damage or destroy cultural resources. -Inventory the entire Nine Mile Canyon area to identify all cultural resources. -Add additional cultural resource staff in BLM's Price Field Office. -Develop safe and scenic turn-out locations for visitors. -Seek appropriate funding to carry out the plan. Finally, I ask that BLM complete the long-overdue National Register nomination for the entire 124,748-acre Nine Mile Canyon area, as a means of providing appropriate recognition of the thousands of prehistoric sites, including more than ten thousand petroglyphs and pictographs, granaries, and standing structures, and the 29 identified historic sites.	
Friends of Nevada Wilderness	OHV Route Identification	The plan allows off-road vehicles to continue driving on the excessive network of trails they have already created without any authorization. Quads, dirt bikes and other vehicles have committed much "unnecessary and undue degradation of the lands and resources," which BLM is mandated to prevent under FLPMA. BLM should stop this by adopting a travel plan that tells off road vehicle users those routes where they may travel. in order to protect known wilderness values in the RMP, vehicle use should be designated as limited to designated trails in all areas with proven wilderness values or in those areas currently being considered as wilderness by Congress so no further damage will be done while Congress considers the proposal. Until the designated routes can be identified clearly on the ground and through maps, vehicle use should be restricted to those routes in the BLM's official road maintenance plan. The Castle Country Heritage Plan developed by Utah citizen groups suggests a way of resolving this issue.	Please see general comment responses #12 and #35
Friends of Nevada Wilderness	Wilderness	Far from resolving the issues, the Price draft RMP feeds the flames of controversy by ignoring the wilderness resource and favoring activities that will destroy wilderness values. It gives the green light to oil and gas leasing on lands that BLM has already determined to have wilderness characteristics. And it fails to deal with the continuing destruction of resources by uncontrolled off-road vehicles. We have these specific comments: • Mineral leasing would be authorized by the draft plan on 98 percent of the wilderness-quality lands outside of the existing wilderness study areas. We do not believe the use of stipulations is enough to safeguard wilderness values in those areas, because they can be waived by the authorized officer. We suggest that a more balanced and rationale approach would be to set a clear no-leasing policy for the lands the BLM has previously identified as having wilderness characteristics or at a minimum designate these wilderness quality lands as limited to no surface occupancy with a clear no exception clause where the no surface occupancy requirement can NOT be waived by the authorized officer. Since figures indicate that approximately 2/3 of the existing leases in Utah are not currently developed, why the rush for issuing more and more leases? Perhaps the next RMP planning cycle would be the appropriate place to re-evaluate the need for leasing areas with proven wilderness values. Further, we urge a moratorium on any leasing in lands proposed for wilderness designation in America's Redrock Wilderness Act (H.R. 1794 and S. 639), until Congress has made a decision.	Please see general comment responses #36 and #101

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Friends of Nevada Wilderness	Wilderness	We would not normally comment on an RMP effort in Utah, but we feel it necessary to do so in this case because the Price draft goes beyond the realm of reason... Far from resolving the issues, the Price draft RMP feeds the flames of controversy by ignoring the wilderness resource and favoring activities that will destroy wilderness values. It gives the green light to oil and gas leasing on lands that BLM has already determined to have wilderness characteristics. And it fails to deal with the continuing destruction of resources by uncontrolled off-road vehicles. We have these specific comments:	Please see general comment responses #36 and #101
Friends of Nevada Wilderness	Wilderness	We suggest that a more balanced and rationale approach would be to set a clear no-leasing policy for the lands the BLM has previously identified as having wilderness characteristics or at a minimum designate these wilderness quality lands as limited to no surface occupancy with a clear no exception clause where the no surface occupancy requirement can NOT be waived by the authorized office. Since figures indicate that approximately 2/3 of the existing leases in Utah are not currently developed, why the rush for issuing more and more leases? Perhaps the next RMP planning cycle would be the appropriate place to re-evaluate the need for leasing areas with proven wilderness values. Further, we urge a moratorium on any leasing in lands proposed for wilderness designation in America's Redrock Wilderness Act (HR 1794 and S 639), until Congress has made a decision. BLM Instruction Memorandum No. 2003-275, entitled "Consideration of Wilderness Characteristics in Land Use Plans" offers a way for BLM to handle wilderness values, consistent with Secretary Norton's no-wilderness policy. It authorizes field managers to protect wilderness characteristics. Several options for doing so are discussed in IM 2003-275. We cite two of particular value for the Price RMP: "protecting certain lands in their natural condition and/or providing opportunities for solitude, or primitive and unconfined types of recreation," and "designating lands as open, closed, or limited to Off Highway Vehicles to achieve a desired visitor experience." We would like to see the final Price RMP protecting all the lands that have wilderness characteristics, using the authority available under IM 2003-275	Please see general comment responses #36 and #101
Friends of Nevada Wilderness	Wilderness	• The plan allows off-road vehicles to continue driving on the excessive network of trails they have already created without any authorization. Quads, dirt bikes and other vehicles have committed much “unnecessary and undue degradation of the lands and resources,” which BLM is mandated to prevent under FLPMA. BLM should stop this by adopting a travel plan that tells off road vehicle users those routes where they may travel. In order to protect know wilderness values in the RMP, vehicle use should be designated as limited to designated trails in all areas with proven wilderness values or in those areas currently being considered as wilderness by Congress so no further damage will be done while Congress considers the proposal. Until the designated routes can be identified clearly on the ground and through maps, vehicle use should be restricted to those routes in the BLM’s official road maintenance plan. The Castle Country Heritage Plan developed by Utah citizen groups suggests a way of resolving this issue.	See general comment responses #19, #35 and #36
Friends of Nevada Wilderness	Wilderness	• BLM Instruction Memorandum No. 2003-275, entitled “Consideration of Wilderness Characteristics in Land Use Plans” offers a way for BLM to handle wilderness values, consistent with Secretary Norton’s no-wilderness policy. It authorizes field managers to protect wilderness characteristics. Several options for doing so are discussed in IM 2003-275. We cite two of particular value for the Price RMP: “protecting certain lands in their natural condition and/or providing opportunities for solitude, or primitive and unconfined types of recreation,” and “designating lands as open, closed, or limited to Off Highway Vehicles to achieve a desired visitor experience.” We would like to see the final Price RMP protecting all the lands that have wilderness characteristics, using the authority available under IM 2003-275.	Please see general comment response #36 and #108
Gasco Energy Company	Minerals and Energy Resources	I am writing this message as a concerned citizen that has the tough task of working in an industry that is struggling to meet the energy demands of our country. These resources will play a critical role in determining	Please see general comment responses #18 and #132

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		whether we will be successful or not. The country is approaching a critical need for new sources of clean energy. Natural gas development is key in helping the county meet in increasing energy needs in an environmentally sound manner. The industry has made great strides in improving its operating techniques to help mitigate the challenges of development. I am a sportsman and outdoorsman. I have personally visited the area being evaluated. I believe that oil & gas development can coexist and that adequate regulations are currently in place through the existing permitting and regulatory process to ensure safe development of the vast resources within this area. Resource development provides high paying jobs and significant tax revenues to the federal, state, and local governments. I am trusting you to look for ways to manage these lands as a multiple use area as they have been in the past.	
Gathering Waters Conservancy	Minerals and Energy Resources	Mineral Extraction: we all live with an archaic mining law. I believe that it's possible for you draft a management plan that honors the letter of that law while also honoring the spirit of Americans' support for wild spaces. Public comment has overwhelmingly supported limiting mineral use on this land. If you do not restrict prospecting, it will happen, even as a guise for other uses. Your management responsibilities will need to oversee and monitor hundreds of small, hopeless, damaging prospecting outfits poking through red for insufficient mineral resources. They'll leave their mess for you to clean, as well (but without money or staff, you won't). This plan should and can prohibit mining use near Desolation, Nine Mile, Devil's, Red Rock and Labyrinth Canyons. Allowing oil and gas extraction near those drainages will definitely compromise water quality, increase erosion, alter riparian habitat and be ugly. That compares to the tiny possibility--so remote to be negligible--that any valuable mineral revenue would come from beneath the red rock. Your plan should and can safeguard the San Rafael Swell, Book Cliffs, and other unmatched natural and national treasures.	Please see general comment response #18
Gathering Waters Conservancy	OHV Route Identification	I work as a wilderness recreational guide in Southern Utah, and have for several companies and schools. I am upset to read that under the current drafted management plan, I will be guaranteed no space in almost all of your management area where I can hike, boat, take horses or camp further than a mile from allowed motorized use. I think that the silent sports community, desert habitat, and the enduring, immeasurable value of the desert landscape deserve wider corridors and more space away from motorized use. I bet if it could, the cryptobiotic soil community would chime in on this point, as well. I'll take it on faith that I'm speaking for it, too.	Please see general comment response #19
Gathering Waters Conservancy	Process and Procedures	Since RMP drafting is hard, and since you can't be pleased by my request (and I expect several others') to fix it, why not use all or substantial sections of the Castle Country Heritage Plan? Your neighbors who also live and work in and near the amazing landscape you manage have written a plan that is a balanced approach that protects lands included in America's Red Rock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #12, #35 and #36
Glen Canyon Group, Utah Chapter Sierra C	Minerals and Energy Resources	Of particular concern is leasing for oil and natural gas exploration and exploitation. I urge you to consider the Castle County Heritage Proposal for Responsible Oil and Gas Leasing, which preserves UWC areas from such development.	Please see general comment response #18
Glen Canyon Group, Utah Chapter Sierra Club	OHV Route Identification	2) Off-Highway Vehicle (OHV) trespass, especially dirt bikes and all-terrain vehicles (ATV's). I refer you to the Castle Country Heritage Proposal for Balanced Transportation Plan.	Please see general comment response #19
Great Basin Institute	Socioeconomics	I am an Environmental Scientist who works with land managers, scientists, businesses, and conservationists in the Southwest, primarily in Nevada and Utah. I am writing to voice my strongest opposition to your draft management plan for the Price Resource Area. The RMP makes absolutely no sense ecologically or	The Proposed RMP/Final EIS and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an

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		economically. It contradicts every rural economic development study we have every seen which show that resource protection, not exploitation, has the largest and longest lasting economic benefit to rural areas. It also violates everything we know about island biogeography, habitat fragmentation and degradation, and biodiversity loss.	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. Also see specific comment response #2649 and general comment responses #2, #57, #58, #65, #67, #72 and #132 .
Great Old Broads for Wilderness	OHV Route Identification	I have spent a fair amount of time over the years hiking in the San Rafael Swell. The Off Road Vehicle situation is entirely out of control on the Swell, and BLM needs to "get a handle" on it soon, while there is still some undamaged land left. While it may be true that only "a few bad apples" are responsible for illegal behavior, once they've carved a route in the fragile desert soil everyone else thinks it's a legitimate trail. There need to be significant sanctions for illegal acts, and somewhere BLM needs to come up with funding for enforcement. The policy on BLM lands should be "Closed unless posted open", the opposite of the present situation. Great Old Broads for Wilderness has developed a monitoring system and database for storage of the results. It can be seen at www.greatoldbroads.org. The database is at www.erythropetrolater.org, and contains data from Arch Canyon and the San Juan ATV Safari at the present time. We will be working with Red Rock Forests and the Utah Sierra Club on the Fishlake NF EIS, as well. I urge you to check it out.	Please see general comment response #19
Heart Warriors Confederacy UK	Cultural Resources	The Nile Mile Canyon is known as the World's Longest Art Gallery. We would add Ancient and Longest Art Gallery. Why ancient? Because of over 10.000 Petroglyphs and, unparalleled rock formations, dating back thousands of years....These unique archaic drawings, left as a legacy by the ancient Fremont and Ute people, must not be desecrated. If the BLM goes ahead. It would be comparable to drilling in the Valley of Kings in Egypt.	Please see general comment response #9
Heart Warriors Confederacy UK	Minerals and Energy Resources	The Bureau of Land Management has set in motion, the Fast Track Process. For it has already approved the use of sound waves, using dynamite and drilling to ascertain the reserves of oil and gas....within a draft Resource and Management Plan, there is a program for full scale industrial development, resulting in oil and gas drilling under the surface, extending to the canyon bottom.	Please see general comment response #18
Heart Warriors Confederacy UK	Wildlife and Fish	Another aspect to consider is the Ecological delicate balance, which would be devastated beyond repair, if the drilling went ahead.	Please see general comment response #40
High Sierra Motorcycle Club	OHV Route Identification	I recommend the Chimney Rock/Summerville Trail system be designated open and included in the OHV trail system on the Preferred Alternative OHV Route Designation Map. Some of your inventoried OHV trails are actually roads requiring license plates; this is not accurately reflected in your route inventory mileage. BLM needs to change this to show how many OHV routes really exist. Over all I would consider this plan confusing over reaching and unenforceable in its present configuration. Please eliminate the over lapping layers on the designation maps, keep all existing routes open and on the map, use geographical boundaries that are easily identifiable If you feel you must regulate use.	Please see general comment responses #19, #31and #37
High Sierra Motorcycle Club	Recreation	I see the BLM is proposing severe group size limits. Group size limits puts clubs, large families and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under	Please see general comment response #81

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		current use levels causes no significant impacts. There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50-vehicle limit and not impose National Park style management on public lands.	
High Sierra Motorcycle Club	Transportation and Access	Preserving our backcountry roads and trails benefits everyone, Wheeled and motorized vehicle access allows a way for all Americans to view and enjoy their public lands. USFS research shows less than 2% of Americans recreate in Wilderness, Over 98 percent of Americans chose to recreate using multiple use roads and trails to access their favorite places. Our Roads and Trails are National Treasures that belong to all Americans, These roads and trails allow access to many Americans who normally would not be able to visit our public lands and be inspired by their beauty. Existing routes should be saved and protected for all to use. They have been shown to provide diverse array of beneficial uses. The most important one being, It is virtually the only way the disabled, the old, and those married with children can access our public lands, It takes away access to those unable to make a difficult trek to visit our public land.	Please see general comment response #10 and #80
High Sierra Motorcycle Club	Transportation and Access	Our existing Roads and Trails are an important aspect of our Rural Western Culture; Access to visit and use our Public lands has been part of our Western heritage for over one hundred fifty years! We need to preserve this. HSMC is committed to maintaining and preserving our existing roads and trails; they are an imbedded part of Western Culture and Character. They provide access to many who otherwise would not be visiting our public lands and they are an extremely important part of rural economies. We really need to study cumulative impacts before we carelessly destroy a National Treasure.	Please see general comment response #10 and #132
Howard County Bird Club	Minerals and Energy Resources	In its treatment of oil and gas leasing the draft plan goes to extremes, opening lands to drilling that have very high wildlife and wilderness values. Outside of the existing wilderness study areas, the draft plan allows leasing on 98 percent of lands that have wilderness characteristics. Those are precisely the lands that should not be leased. Their wilderness values will be considered by Congress, and those values should be protected until Congress makes the decision. We urge BLM to bar oil and gas leasing in all areas proposed for wilderness status in America's Redrock Wilderness Act. The official WSAs are already closed to leasing; so should the other proposed wilderness lands.	Please see general comment responses #18, #36 and #101
Howard County Bird Club	OHV Route Identification	We urge BLM to close all the proposed wilderness areas in America's Redrock Wilderness Act to motorized traffic. The proposed plan does nothing to stop ORVs from continuing to travel on hundreds of miles of existing vehicle tracks. It merely bars cross-country travel. The greatest problem is the travel of motor vehicles on the network of unauthorized routes created by ORVs. These have a serious impact on wildlife values, especially those routes in riparian zones. We also encourage BLM to close to motor vehicles all routes that are not needed for public purposes identified in the plan. Old vehicle routes, jeep trails and ORV trails should not be left open unless they serve a need, and only if they are not causing degradation of wildlife values. History shows that as the public discovers superb wildlands such as those in this planning area, any route that is still open, even a dirt track created by the passage of	Please see general comment responses #12 and #19

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		vehicles, will be used by more and more vehicles, and it will be too late to shut it down.	
Howard County Bird Club	Wilderness	The draft Price RMP mistakenly fails to consider wilderness values. We are aware that Secretary of the Interior Gale Norton has adopted a "no more wilderness" policy for BLM planning, but that is being challenged in the courts. We believe BLM has an obligation to consider wilderness in this management plan, under sections 201 and 202 of the Federal Land Policy and Management Act (FLPMA). The Howard County Bird Club has endorsed the America's Redrock Wilderness Act (S. 639, H.R. 1796), which proposes for designation as wilderness a number of areas in this planning area. Moreover, four Maryland members of Congress are among the cosponsors of this bill. BLM should treat the proposed wilderness areas with kid gloves, because Congress will be acting on those proposals at a later date. BLM would be wise to give those areas some form of protective status so their wilderness character will not be impaired, pending final action by Congress. We see no such protection in the draft RMP. It should be added in the final plan.	Please see general comment response #36
Howard County Bird Club	Wildlife and Fish	The 2.5 million acres of the Price Field Office are home to an interesting assemblage of birds and other forms of wildlife. The streamcourses and the riparian habitat along them are crucial for wildlife in this arid region. Bird observers in Utah have pointed to their importance for migrant species traveling through the Colorado Plateau region. The draft EIS correctly discusses the value of this habitat as wildlife corridors.	Specific actions designed to protect and enhance riparian and wetland areas have been adopted and are stated in Chapter 2 of the Draft and Final RMP/EISs. As discussed in the Draft and Final RMP/EISs, riparian areas would be managed to attain Proper Functioning Condition (PFC) through whichever action is necessary as determined for site-specific plans and actions.
Huntington Cleveland Irrigation Company	Soil, Water and Riparian	The water in the San Rafael River and Muddy Creek drainage is fully appropriated. Any activity that affects water in these drainages directly affects the appropriated right of that drainage. If mining in a particular drainage diverts water from that drainage, or in any other way affects the yield of that drainage, now or in the future, that water must be replaced or a settlement mitigated so that those holding the water right are not harmed in any way. All water in drainage is hydrologically related. When water is removed from a mined area it will be replaced with surface water which would otherwise enter the appropriated system. It doesn't matter if that water is determined to be so-called old water or water flowing from a spring. If it is lost or removed from that drainage, it is the responsibility of the mining company to replace or satisfactorily mitigate the impact of their actions.	Assignment and administration of water rights is under the administration of the State Engineer's office. and BLM will comply with his decisions. At the implementation stage, oil and gas operators may be required to monitor the effects of water usage and to replace water if necessary. See general comment response #86.
Huntington Cleveland Irrigation Company	Soil, Water and Riparian	The streams which comprise the San Rafael River drainages are currently functioning as water delivery systems for industrial, municipal and agricultural use. Those watersheds are very vital to Emery County. Any alteration or disruption of this system will dramatically affect the counties, agriculture communities and industry both economically and socially.	The San Rafael River system is a dynamic system and will change over time. Irrigation systems, new canals, new reservoirs, etc, will change the system and dramatically affect the counties, agriculture communities and industry as stated. The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, reducing erosion, stream sedimentation and salinization. Water resources would also be protected in community watershed and sources of culinary water. Decisions in the RMP concentrate on

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			maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition.
Huntington Cleveland Irrigation Company	Soil, Water and Riparian	The ability to transfer and sell water rights during drought years is especially critical. PacifiCorp's power generating plants, which distribute power throughout western states, are dependent on water and the ability to lease and/or purchase water from others. Any encumbrance on this ability would have significant effects to a broad range of citizens. Much of the Wasatch front's power is generated from the Hunter and Huntington Plants.	The Price RMP Decisions would not establish any water rights. Federal water rights would be acquired through State appropriation proceedings. BLM does not control PacifiCorp's sale or purchase of water rights and permits.
Huntington Cleveland Irrigation Company	Soil, Water and Riparian	Huntington Cleveland Irrigation Company expects the Price Field Office to honor the valid existing rights of the water holders in Emery County and that the Price Field Office Resource Management Plan will not affect these rights in anyway.	BLM must comply with all State and Federal Laws, including honoring water rights granted by the State Engineer's office. BLM must recognize valid existing rights. This is common to all of the alternatives addressed in detail in the Proposed RMP/Final EIS.
Huntington Cleveland Irrigation Company	Wild and Scenic Rivers	Huntington Cleveland Irrigation Company also believes that there should be no designations of Wild and Scenic Rivers within the Price Field Office Resource Management Plan. Since, prior to 1900s, Reservoirs were built, the idea of "Wild" rivers in any practical sense is a misnomer and demonstrates inappropriate thought. The major reason, and especially as may be the case in drought years the "only" reason, that these rivers continued to flow with any real measurable amounts continually from July on, is because of controlled outflows from storage reservoirs and not because the flow is wild.	Please see general comment responses #86 and #88
Independent Petroleum Association of Mountain States (IPAMS)	ACEC	We recognize that FLPMA directs BLM to assess the planning area for potential ACECs. Additionally, we acknowledge that ACECs may be designated within wilderness areas or wilderness study areas. However, BLM Manual 1613 expressly instructs that in relation to WSAs, "An ACEC designation shall not be used as a substitute for a wilderness suitability recommendation. If an ACEC is proposed within or adjacent to a WSA, the RMP or plan amendment shall provide a clear description of the relationship of the ACEC to the recommendations being made for the WSA. The relationship shall be described to the level of detail required to avoid misunderstanding or misrepresentation by the public." BLM has failed to abide by this direction with respect to the proposed Range Creek ACEC.	Please see general comment response #156
Independent Petroleum Association of Mountain States (IPAMS)	ACEC	The proposed Range Creek ACEC covers nearly 81,000 acres of high potential natural gas formations identified by the US Geological Survey. The proposed ACEC is the eastern portion of the highly prospective Uinta Basin-Book Cliffs Coal Bed Natural Gas Field/Play and an area with high potential for future natural gas exploration and development. The proposed designation constitutes a direct attempt to extend the boundaries of the Turtle Canyon and Desolation Canyon WSAs. As provided above, such actions are expressly prohibited in BLM ACEC Manual 1613. We, therefore, strongly oppose the proposal to include additional lands adjacent to existing WSAs in an ACEC because it directly conflicts with existing BLM policy. Additionally, according to map 3-23, the northern tip of the proposed ACEC has already been leased for oil and gas. It is our understanding that additional leases have been nominated in other portions of the ACEC outside the WSA boundaries.	Please see general comment response #156
Independent Petroleum Association of Mountain States (IPAMS)	ACEC	The President's National Energy Policy and executive order 13211 places emphasis on identifying and eliminating impediments to natural gas and oil development. Designation of Range Creek as an ACEC outside WSA boundaries is also contrary to this direction. Furthermore, BLM's stated justification that the area contains	Please see general comment response #156

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		valuable cultural and "natural process" values fails to accept that oil and natural gas operations are conducted with full attention to such values through customary mitigation measures. The assumption that the only way in which this area can be adequately protected is through a "no lease" designation is groundless and constitutes capitulation to designate the area as de-facto wilderness in accordance with the wishes of the Southern Utah Wilderness Alliance. We strongly recommend that BLM revise the ACEC proposal to eliminate the lands outside the WSAs' boundaries thereby eliminating the no lease requirement of non-WSA lands.	
Independent Petroleum Association of Mountain States (IPAMS)	ACEC	Industry strongly challenges BLM's proposal to designate 62,885 acres of Nine Mile Canyon an ACEC, requiring NSO from canyon rim to canyon rim with an imposition of Class 11 Visual Resource Management (VRM) in the same area. BLM has failed to consider critical factors that reduce its ability to actually manage this area as an ACEC. First, nearly the entire area is under existing lease which prohibits BLM from applying the drastic management measures as proposed. Second, the canyon bottom, which is where development activities are currently taking place, is predominately held by private landowners, thereby decisively reducing BLM's ability to control development activities in the area. Moreover, BLM already has established its authority to protect valuable cultural sites, such as ancient pictograph areas, through lease stipulations. It is evident that BLM's proposal to designate this area an ACEC with highly restrictive management is a deliberate attempt to thwart on-going exploration and development activities in violation of the President's National Energy Policy and valid existing lease rights. BLM claims throughout the DEIS that it will protect valid existing lease rights from abrogation. However, ACEC designation of this area will openly violate rights already granted through the imposition of highly restrictive conditions of approval (COA) on existing leases at a minimum through the use of VRM Class II management objectives. This management approach is unacceptable and inappropriate in an area that is already experiencing significant development activities.	Please see general comment response #154
Independent Petroleum Association of Mountain States (IPAMS)	ACEC	We also object to the proposal to designate the following areas as ACECs because BLM has failed to identify a prevailing need to protect significant values associated with these areas: • Lower Green River - 43,428 acres • Beckwith Plateau - 956,980 acres • Temple-Cottonwood Dugout Wash 80,818 acres • Gordon Creek - 4,099 acres Despite BLM's proposal to designate these areas as ACECs, it has also been pointed out that no special management to protect these values is necessary. No justification related to fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened resources has been identified. Clearly, given BLM's assessment that no special management is needed in these areas, none of these areas have been recognized as warranting protection in order to satisfy national priority concerns, public or management concerns about safety and public welfare. Once again, it is quite evident that BLM's intent is to arbitrarily create ACEC designations without meeting its own significance criteria in an attempt to placate special interest groups.	Please see general comment response #158
Independent Petroleum Association of Mountain States (IPAMS)	Cultural Resources	We support BLM's statement on page 2-34, "...a field manager could waive inventory for any part of an area of potential effect when...Inventory at the Class III level has previously been performed..." So often the same areas are needlessly resurveyed for which an operator incurs redundant financial expenditures and delays. To aid in the field manager's decision-making process, we strongly recommend that BLM assemble a data base to which agency staff or operators can refer to determine whether an area has already been cleared for activity. Such a data base would help alleviate unnecessary resurveys by operators and extraneous reviews by BLM personnel.	The BLM Manual procedures are the foundation to both the national Programmatic Agreement (nPA) and the Utah Protocol. The Manual is a comprehensive document which was accepted by the Advisory Council on Historic Preservation (ACHP) and the National Conference of State

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			Historic Preservation Officers (NCSHPO) as being consistent with statute and regulations. The nPA specifically incorporates the BLM Manual as guidance to BLM Field Offices in lieu of the implementing regulations; the Utah Protocol is tiered directly from the nPA. Inventory waivers may be applied only under limited circumstances as set forth in the BLM Manual, and pertain only to the conduct of pedestrian inventory for a particular proposed undertaking. Waivers are only employed when there is defensible information to allow a professional judgment that physical traces of cultural resources will not be present. BLM provides an opportunity for tribes to consult with BLM to resolve any tribal concerns, including the identification, evaluation, and treatment of properties with traditional religious and cultural values. There is no inherent relationship between physical inventory to locate historic and archaeological resources, and the process of working with tribes to identify properties that have traditional religious and cultural value. Only tribes can identify these traditionally important places; archaeologists looking for physical traces of the past cannot identify such properties.
Independent Petroleum Association of Mountain States (IPAMS)	Lands and Realty	Under Alternatives A, B, and D, as described on page 4-397, pipelines with a diameter greater than 16 inches would need to be placed in either existing corridors or corridors that will be designated in the future. Using a pipeline size of 16 inches is arbitrary and capricious without any supporting documentation as to why this particular diameter or greater would be a significant size and smaller pipelines would not be considered. The DEISIRMP also states that additional corridors would be designated subject to physical barriers and sensitive resource values. If and when these ROW corridors would be selected in the future, we recommend that industry representatives be included in any decision process concerning the location of the corridors.	The level of surface disturbance associated with pipelines greater than 16 inches is such that more intensive management (i.e., restricted to designated ROW corridors) is required to ensure the protection of other resource values within the planning area. The smallest diameter for a transmission or sales line is usually 16 inches. This type of line would commonly be looped at some point following its construction. That process would require dedicated space in which to construct the loop line. The need for dedicated space would require that the original transmission or sales line be placed in a corridor. A 16-inch line, however, would not always be a transmission or sales line. In an area with a large number of wells, a 16-inch line could also be used for a lateral gathering line. In that case, inclusion in a corridor would not be necessary. Smaller pipelines can be constructed

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			without creating surface disturbance that is inconsistent with the goals and objectives of other resources. This determination was based on past field experience and best professional judgment of BLM resource specialists. ROW corridors would be selected in accordance with BLM Manual 2801.11 and 2801.12.
Independent Petroleum Association of Mountain States (IPAMS)	Lands and Realty	Under Alternatives A, B, and D, avoidance areas for new utility corridors which include 16-inch or greater pipelines would include, among others, "on or within 1 mile of sage-grouse leks." However, this criterion is inconsistent with Appendix 8, Spatial and Seasonal Wildlife Conservation Measures. Restrictions concerning sage-grouse leks refer to No Surface Occupancy from 3-15 to 6-1. Therefore, the DEISIRMP would restrict construction of a 16-inch or greater pipeline throughout the year, while a NSO restriction near sage-grouse leks would only restrict construction from 3-15 to 6-1. Such a discrepancy could negatively affect pipeline construction and must be changed to reflect the seasonal, and not permanent, restriction for construction near sage-grouse leks.	Appendices 8 and 16 of the Draft RMP/EIS have been combined and corrected in Appendix G of the Proposed RMP/Final EIS. Appendix G is "Stipulations for Surface Disturbing Activities". Stipulations would be appended to land use authorizations, permits, and leases issued on BLM-administered lands. The sage grouse leks stipulations now include: -No surface occupancy (NSO) would be allowed within 2,640 feet (0.5 miles) of known Sage Grouse Leks (allows exceptions and modifications, no waivers); -Greater sage grouse breeding, nesting, and early brood-rearing habitat would be closed seasonally (March 15 to July 15). Seasonal restrictions would apply within 10,560 feet (2 miles) of known greater sage grouse leks (allows exceptions, modifications, and waivers); -Sage grouse wintering areas would be closed seasonally (December 1 to March 14). In the alternatives for Transportation and Utility ROW Corridors, within one mile of sage grouse leks is an avoidance area under Alternative A and D for new corridors, an exclusion area under Alternative B for new corridors, only existing corridors would be considered under Alternative C, and standard stipulations/site specific evaluation under the No Action Alternative. This provides a range of alternative for consideration and the impacts to resources as well as industry are disclosed in Chapter 4. The Stipulations for Surface Disturbing Activities Appendix includes a year

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			round NSO restriction of a half mile from leks and alternatives increase the buffer for corridors to a mile. It should be noted that avoidance stipulations only apply to new corridors, not to existing utility corridors.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Notwithstanding BLM's multiple use mandate, the Preferred Alternative (Alternative D) is the most restrictive of the Alternatives on many resources/land uses. BLM's selection of Alternative D as their Preferred Alternative demonstrates a bias against energy and minerals. IPAMS and PLA oppose adoption of Alternative D.	Please see general comment response #18
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Overall, we object to adoption of Appendix 8 stipulations (particularly under Alternative D) because they are extremely restrictive without due cause and would cause severe and unacceptable adverse impacts on the ability of oil and gas operators to fulfill their lease obligations within the Price Field Office.	Please see general comment response #18
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	With respect to oil and gas resources, BLM's Manual 1601 on Land Use Planning, and Manual 1624 on Planning for Fluid Minerals, specifically direct BLM not only to identify which areas would be subject to different categories of restrictions as included in the DEIS, but also to show that the least restrictive lease stipulation that would offer adequate protection of a resource has been selected. See BLM Handbook H-1601-1, App. C. II. F. at 16. BLM failed to provide this essential analysis anywhere in the planning document. This omission is cause for great concern because it demonstrates that BLM has not carefully considered the effect of restrictive lease stipulations or permit conditions of approval (COA) upon current and projected future oil and gas activities in the area. Given the fact that the plan will ostensibly be used to make future decisions on activities, this lack of analysis and, hence, justification is also a fatal flaw of the DEIS.	Please see general comment response #49
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	We fully support BLM's stated intent to recognize valid existing lease rights, as required under BLM's FLPMA implementing regulations. See 43 C.F.R. § 1610.5-3(b). However, it is evident that such statements made throughout the DEIS are simply giving the issue lip service. It has been the experience of operators in the Price Field Office that BLM often applies COAs to operations that far exceed the terms of the lease. Therefore, it is necessary for the agency to clarify that it has the discretion to modify proposed actions subject only to the voluntary agreement of the holder of valid existing rights. According the BLM's 1601 Planning Manual, such modifications may include 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. Clearly, BLM has ignored its own direction in selecting Alternative D as its Preferred Alternative. We strongly recommend that BLM reconsider its choice of preferred alternative based upon comments received by the petroleum industry.	BLM recognizes valid existing rights; however, new leasing is a discretionary action. The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of mineral development.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	BLM policy as embodied in IM 92-67 instructs that mitigation is required to prevent unnecessary and undue degradation under FLPMA is within the terms of the lease. However, the standard for determining what constitutes unnecessary and undue degradation must also acknowledge that there is also "necessary and due degradation." Specifically, it is stated that if mitigation "would render a proposed operation uneconomic or technically infeasible so that a prudent operator would not proceed, such degradation may also be considered necessary for the management of the oil and gas resource." Since this policy appears to have been ignored by BLM when assembling the draft RMP and DEIS, a new look at the alternatives is necessary and a new alternative that carefully addresses this issue along with the other issues raised in these comments must be considered	Please see general comment response #54

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		before a proposed plan is developed.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Each alternative contained in the Draft RMPIEIS includes some lands closed to energy resource development. Such closures are based on the BLM's assessment of resource values on those lands, but closure also has implications in terms of national energy consumption and commodity prices, foregone employment opportunities, tax revenues and support for state and local economies. Although BLM must necessarily base land use decisions on consideration of all resources values, social and economic impacts of closure decisions should be estimated to fulfill the agency's mandate under FLPMA, and to comply with the guidelines contained in BLM's Land Use Planning Handbook (H-1601-H) and Instruction Memorandum No. 2002-167.	Please see general comment response #18
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	The number of allowable wells per year is a highly significant conclusion of the RMPIEIS and represents a regulatory ceiling of 1,540 wells as described on page 4-4 of the RMPIDEIS: "These numbers represent allowable development under each alternative and do not represent actual wells that would be drilled". To the extent this statement is an attempt by BLM to place a limit on the number of wells to be drilled under the RFD, it is contrary to established BLM policy and established legal precedent. The Interior Board of Land Appeals has explicitly rejected the premise that an RFD scenario in an RMP functions as a ceiling or cap on number of wells that can be drilled within a RMP area. See Wyoming Outdoor Council, 156 IBLA 377, 385 (2002); National Wildlife Federation, et al., 150 IBLA 385, 402 (1999). It is well settled that a resource management plan's general reference to a number of wells that might be anticipated or assumed annually within a planning area "does not constitute a term, condition, or substantive limit on the number of wells BLM may authorize." S. Utah Wilderness Alliance, 159 IBLA 220 (2003). In addition, this statement does not comply with BLM's oil and gas RFD policy, IM No. 2004-089, "Policy for Reasonably Foreseeable Development (RFD) Scenario for Oil and Gas," (Jan. 23, 2004), which specifies: "The fact that the total number of wells in an area may exceed the total number of wells projected in the selected alternative does not automatically mean that a supplement to the NEPA document or a revision or amendment to the RMP is necessary. it is possible that exceeding the number of wells projected in the selected alternative may not result in exceeding the predicted level of environmental effects. Mitigation of environmental effects through successful reclamation, clustering wells on shared well locations, and minimizing pad and road construction can prevent the level of impacts from substantially exceeding the impacts analyzed in the original RMP/EIS or other NEPA documentation." Id. Thus, the DEIS' statement that it would impose a "ceiling" of well numbers conflicts with BLM policy and must be changed to reflect the direction contained in IM 2004-089.	The RFD for the number of wells that will be drilled is an estimate of what will occur in the future and is used for analysis purposes. The RFD does not constitute a "regulatory ceiling" on the number of wells that can be authorized. This number can change widely due to factors which cannot be accurately determined. Examples of these factors are the price of oil and gas, the success or failure of exploration in unproven areas, the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. Future drilling projects will be analyzed in either environmental assessments or environmental impact statements on a project specific basis. If the number of wells or level of disturbance projected in the RFD is clearly exceeded in the future, BLM would be required to supplement its analysis. BLM has revised the RFD based upon public comment. Your concerns regarding numbers of wells and compliance with IM 2004-89 are discussed in the revised RFD, Appendix M.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	The Draft RPM does not comply with BLM's oil and gas RFD policy. See BLM IM No. 2004-089. This policy requires that an RFD scenario must consider, among other things, "petroleum engineering principles and practices and economics associated with discovering and producing oil and gas." The policy explains further that an RFD scenario must be "based on a reasonable, technical, and scientific estimate of anticipated oil and gas activity based on the best available information and data at the time of the study." IM 2004-089, Attachment 1-3. In addition to geologic data, the RFD must consider "economics, changes in exploration, drilling, completion or production technology, physical limitations affecting surface access, bid performance at lease sales, oil and gas related infrastructure, and transportation." Attachment 1-4. The policy also requires a review and discussion of oil	Because the Price RMP revision effort was initiated prior to the Instruction Memorandum (IM) cited in the comment, the Reasonably Foreseeable Development Scenarios (RFDs) for the Price RMP were not developed according to those instructions. However, an RFD has been developed for each alternative analyzed in detail. Appendix M in the Proposed RMP/Final EIS explains the RFD

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		and gas occurrence potential, including an analysis of plays and oil and gas assessments. Attachment 1-8. The DEIS and draft RMP contain only perfunctory statements regarding the RFD. As detailed below, the RFD scenario does not reflect that it is based on the required information detailed in the oil and gas RFD policy.	scenarios for the Proposed RMP/Final EIS. The RFD estimate is based on the most accurate information that BLM had at the time of report preparation. The RFD for the number of wells that will be drilled is the BLM's best estimate of what will occur in the future. This number can change widely due to factors which cannot be accurately determined including future prices of oil and gas, the success or failure of exploration in unproven areas, and new technology. If the number of wells or level of disturbance exceeds the RFD, BLM would be required to do further analysis.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	The Draft RMPIEIS states on page 1-11:"The RMP will ensure that minerals management issues, opportunities, and potential impacts will be addressed at an appropriate regional scale and will consider the following: Updated RFD scenarios for mineral development to be updated on a regional scale". Despite the above statement, no documentation is explicitly presented in the Draft RMPIEIS explaining how the RFD well numbers were developed other than to assume it is essentially based upon drilling activity that has occurred to date, 1,402 wells. It appears that a limited number of wells for each alternative was simply estimated, and then an inadequate impact analysis was performed based on the assumptions of the RFD for each alternative.	The RFD for the number of wells that will be drilled is the BLM's best estimate of what will occur in the future. This number can change widely due to factors which cannot be accurately determined. Examples of these factors are the price of oil and gas, the success or failure of exploration in unproven areas, the willingness of investors to invest their money in risky exploration for oil and gas in unproven areas. The numbers of wells that will be drilled in the future are not set by the RMP which is attempting to estimate the impacts of future drilling activities.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	In addition, the Draft RMPIEIS reflects that significant information required to be considered in the RFD was not addressed in any respect. The Minerals Potential Report does not address significant hydrocarbon-bearing zones in the planning area. Some of these areas have been identified for several years. For example, in the 1995 United States Geologic Survey play assessments several zones were identified but numerous plays were entirely omitted from the Minerals Potential Report. Specifically plays 2002, 2003, 2004, 2005, 2016 and 2018 were not mentioned in the Minerals Potential Report nor analyzed in the Draft RMPIEIS.	Please see general comment response #51
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	The RFD also fails to acknowledge or analyze other significant oil and gas industry; data that is available within the BLM. This absence of information is significant because it would identify prospective areas known to be of interest for mineral leasing thereby aiding in preparing a RFD consistent with BLM policy. This data includes nominated lands for lease sales, seismic permit requests, drilling permit requests, and actual wells drilled on BLM and adjacent state or fee lands. In the Price planning area, lands in the Nine-mile area have been nominated for more than a decade; there is recent and historic seismic activity in the area, and wells being drilled. These factors coupled with the activity north of the planning area indicate that oil and natural gas development should be expected and planned for in the area. Because the RFD did not analyze any of these factors, it must be modified to reflect at a minimum these factors and those mentioned below.	Please see general comment response #51
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	BLM's oil and gas RFD policy expressly states that the RFD baseline scenario is not the "No Action Alternative" in the NEPA document. A. 1-1. The RFD report included in Appendix 21 to the Draft RMPIEIS, however, states that the baseline RFD is "based on a continuation of current management (no action alternative) as directed by BLM	Please see general comment response #53

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		Handbook H-1624-1." App. 21 at 1. This statement ignores the directive in the RFD policy that "if there is a conflict between the BLM Manual Handbook H-1624-1 and the policy presented in this Instruction Memorandum, this policy prevails." IM 2004-089, Attachment 1-1. Thus, BLM must revise the RFD report and the DEIS to conform to IM 2004-089.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	According to IM 2004-89, "The RFD projects a baseline scenario of activity assuming all potentially productive areas can be open under standards lease terms and conditions, except those areas designated as closed to leasing by law, regulation or executive order." [Emphasis added] According to BLM's oil and gas RFD policy, the baseline RFD is to be unconstrained by restrictions. The RFD scenario in the Draft RMPIEIS does not reflect this requirement. The RFD scenario is insufficient because the procedures outlined in IM 2004-89 were not followed and no documentation stating how the RFD was developed was provided for either a baseline RFD or for each alternative. The RMPIEIS and supporting documentation must explain the rationale for the different levels of development for each alternative.	Please see general comment response #53
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Given that there is no basis or rationale provided in the Draft RMPIEIS for the RFD scenarios, one must assume that BLM improperly utilized other data. For example, it is possible that the proposed Areas of Critical Environmental Concern (ACEC) may be one of the reasons for the different RFDs in each alternative. No ACECs are proposed under Alternative A and the RFD is 1,900 wells. However, the descriptions on pages 4-524 through 4-526 do not support a similar conclusion for Alternatives B and C.	Please see general comment response #51.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Both ACECs would be closed for leasing and be open for leasing with what BLM terms "minor constraints"." However, BLM has proposed no surface occupancy from canyon rim to canyon rim in Nine Mile Canyon, which cannot be construed to be a "minor constraint. Nevertheless, the RFD for Alternative B is 1,400 wells and 1,100 wells for Alternative C. Therefore, other constraints are assumed to come into play. But these other constraints are never identified, let alone analyzed and explained. In addition to being contrary to NEPA, FLPMA, and established BLM rules and policies, it is unreasonable to expect document reviewers to guess what methods were employed by the drafters of the DEIS to arrive at the RFD numbers in each Alternative.	Please see general comment response #51.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	In sum, BLM must revise the Draft RMPIEIS to comply with its oil and gas RFD policy. Any assertion by the BLM Price Field Office that it was not required to expand the scope of the RFD scenario to comply with IM 2004-89 because BLM completed its RFD analysis prior to issuance of the IM in January 2004, would not be a sufficient basis for BLM to circumvent the directives of this policy. Such an assertion would be flawed, inconsistent with the plain language of the agency's regulations, and, at best, would result BLM being required to revise the entire RMP process immediately after it is completed.	Please see general comment response #53
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Under BLM regulations, "[a] resource management plan shall be revised as necessary, based on monitoring and evaluation findings, new data, new or revised policy, a change in circumstances or a proposed action that may result in a change in the scope of resource uses or change in the terms, conditions and decisions of the approved plan." 43 C.F.R. § 1610.5-6 (emphasis added). Federal courts and the IBLA have both recognized this requirement. See Klamath Siskiyou Wild/ands Ctr. v. Boody, 2004 U.S. Dist. LEXIS 9649, *8-9 (D. Or. May 18, 2004); Great Basin Mine Watch, 159 IBLA 324, 340 (IBLA, 2003). Accordingly, the BLM's own regulations require a revision of a RMP to conform with new policy initiatives or with changes in the scope of resource uses. Thus, regardless of when BLM completed its RFD analysis for the draft RMP, BLM must now redo that analysis to conform to the policy and scope of IM 2004-89. This is particularly true since this new policy was issued seven months before the draft RMP/DEIS was released for public comment. Moreover, BLM can revise these documents to cure these fatal deficiencies before release of the final draft. Any assertion that BLM is somehow	Please see general comment response #53

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		not required to follow its own oil and gas RFD policy would be baseless and subject to challenge.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	In addition, the information detailed above required for a sufficient RFD qualifies as "new data" which triggers BLM's obligation to revise the Draft RMPIEIS under 43 C.F.R. § 1610.5-6. As the IBLA has explained, when "an RMP no longer accurately reflects the factual knowledge available to BLM decision makers on a matter ultimately critical to the resource allocation decisions implicit in the RMP [then] it becomes the obligation of the appropriate BLM officials to initiate actions leading to the revision or amendment of the RMP." S. Utah Wilderness Alliance, 144 IBLA 70 (1998). In addition, the IBLA explained further that this obligation "is true regardless whether the knowledge becomes available 10 years or 10 months after the RMP is adopted." Id. In sum, under the clear language of BLM's regulations implementing FLPMA, established BLM policy, and IBLA precedent, BLM must revise the Draft RMPIEIS to include a sufficient RFD scenario and related alternatives and analyses.	Please see general comment response #51
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Conflict between Executive Summary and RMPIDEIS RFD Well Numbers: In the Executive Summary on the table titled Alternatives Comparison: Oil, Gas and Coal Bed Methane Leasing, the allowed number of wells per year for each alternative does not match the numbers shown in Table 4-2 of the RMPIEIS. For example, the Executive Summary lists 60, 75, 75, 65, and 74 wells/year for the No Action Alternative, Alternative A, Alternative B, Alternative C, and Alternative D, respectively. Table 4-2 in the RMPIEIS lists 77, 95, 70, 55, and 72 wells/year for the No Action, Alternative A, Alternative B, Alternative C, and Alternative D, respectively. A reader only reviewing the Executive Summary would come to the conclusion that the maximum level of oil and gas activity allowed under Alternative D, the Preferred Alternative, would exceed the current management levels. A reader of the RMPIEIS would conclude the opposite. This conflict is extremely significant to oil and gas development. On page 4-2 of the RMPIEIS, it is stated that the number of wells shown on Table 4-2 represent allowable development under each alternative and do not represent actual wells that would be drilled. Since these numbers could ostensibly represent a regulatory ceiling on the number of wells that could be drilled, conflicting levels of development in the RMP and EIS are unacceptable.	Please see general comment response #51
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Recommended Changes: In order to comply with the FLPMA, NEPA, and BLM policy the RFD should be developed to consider the following information and USGS 1995 Play Assessments, the analysis of which is wholly absent from the Minerals Potential Report. • Play 2016: W of Green River, Wasatch & Mesaverde Tight Sands, Continuous-type • Play 2018: Mesaverde Tight Sands, basin Flank, Ro>1.1, drlg depths < 15K. • Play 2003: Upper Cretaceous Sandstones, including the Mesaverde, • Conventional sandstones traps (Structural, Stratigraphic and combination Structural/Stratigraphic), updip from Ro > 1.1, both east and west of Green River • Play 2004: Conventional Dakota and Jurassic reservoirs; appears to be depth limited at approx. 13,000' • Play 2005: Conventional Permian and Pennsylvanian sandstones and carbonate reservoirs • Play 2002: Conventional Tertiary oil and gas (like an updip from Monument Butte Complex, 'black wax,' waterflood) plays • Other sources of data in addition to the UGS "To be Released in 2003" Bulletin 132 • Potential Gas Committee - publishes gas resource potential for all domestic basins every 2 years	Please see general comment response #51

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		• AAPG Sectional and Annual Meetings with individual geoscientists' presenting papers • Other regional geologic societies, like the Rocky Mountain Association of Geologists (RMAG), in specific programs, meetings and symposia. • Interviews with Industry • Interviews with Price District BLM employees with oil and gas experience • The RFD should also take into consideration the following elements to help in planning for mineral development. These factors can be indicative of interest in a particular area for oil and gas development. • Nomination of lands (EOI), both Federal & State • Seismic Data (Historical surveys and Permit Requests) • Request for drilling permits • Wells drilled • Natural Gas Prices	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Based upon the foregoing, the number of wells in the RFD will necessarily increase. The number of wells is determined by the nature of the geologic formations in a particular area. The RMP discusses 80 acre spacing which, based on industry experience, will be inadequate to maximize development of the natural gas resources. The RMP further does not account for the probable development of various depths and various horizons present in the planning area. The petroleum industry believes that 40 acre spacing is a technically realistic requirement for developing the tight sands within the planning area. Based upon these needs, the following represents industry's estimate of the number of wells to adequately develop the resources in these areas. It is crucial that the RFD be changed to account for the increased development within the planning area.	Please see general comment response #48
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Revising the RFD and Expanding Related Analyses to Allow Tiering: As noted above, the scope of the draft RMP and its underlying DEIS lacks basic information and arbitrarily limits the reasonably foreseeable development ("RFD") scenarios. These deficiencies are to the detriment of BLM. If the draft RMP is finalized without the broader NEPA analysis of an expanded RFD, BLM will likely be unable to tier subsequent, site-specific NEPA analyses to the RMP EIS, and will have to draft independent environmental assessments and environmental impact statements before authorizing subsequent development in the region. This would result in a needless drain on BLM resources by, among other things, requiring unnecessarily extensive and costly NEPA analyses and documentation. BLM will better serve its own interests by proactively investing its resources in developing a thorough RMP and EIS to which it can tier subsequent decisions. NEPA's implementing regulations encourage "tiering" to streamline NEPA analyses and to promote efficient, yet informed decision-making. 40 C.F.R. §§ 1502.20 & 1508.28. The CEQ regulations provide, "whenever a broad environmental impact statement has been prepared (such as a program or policy statement) and a subsequent statement or environmental assessment is then prepared on an action included within the entire program or policy (such as a site-specific action) the subsequent statement . . . need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action." 40 C.F.R. § 1502.20. By definition, a resource management plan is a programmatic planning document and is "not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations." 43 C.F.R. § 1601.0-5(k). Thus, RMPs and their underlying EISs are precisely the types of documents to which subsequent NEPA analyses should be tiered.	Please see general comment response #53

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		If the NEPA analysis in the RMP EIS is adequate, subsequent, site-specific analyses for proposed projects in that region can be tiered to the RMP EIS to promote efficient, informed decision-making, it is well settled that EAs can be tiered to RMP EISs. See, e.g., Cob. Environmental Coalition, 161 IBLA 386, 2004 IBLA LEXIS 36, *26-27 (June 4, 2004); S. Utah Wilderness Alliance, 159 IBLA 220, 242 (2003) (citing Blue Mountains Biodiversity Project, 139 IBLA 258, 267 (1997); Or. Natural Res. Council, 115 IBLA 179, 186 (1990)). But, if the scope of the NEPA analysis in an RMP EIS is too narrow and fails to anticipate all reasonably foreseeable uses in the region, subsequent decisions that fall outside the scope of the RMP EIS must be independently supported by their own NEPA analyses. In addition, an inadequate RMP/EIS can lead to reversal of BLM decisions that attempt tier to such a document. For example, a recent decision by the U.S. Court of Appeals for the 10th Circuit reinstated an IBLA decision that reversed a BLM oil and gas lease sale because the underlying RMP to which BLM attempted to tier did not take the requisite "hard look" under NEPA at environmental impacts of coal bed methane. Pennaco Energy, Inc. v. U.S. Dep't of Interior, 377 F.3d 1147, 1153, 1159-60 (10th Cir. 2004) ("Because the Buffalo RMPIEIS failed to take the requisite hard look at the impacts associated with CBM extraction and development . . .BLM could not rely on that document to satisfy its NEPA obligations for the proposed leasing decisions at issue here.") (quoting Wyoming Outdoor Council, 156 IBLA 347, 358 (2002)). Accordingly, the draft RMP and DEIS must be restructured to include an adequate RFD and related analyses so that BLM can tier to these documents for subsequent project specific actions.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Directional Drilling: Several times the Draft RMPIEIS mentions directional drilling as an available technology to access and develop fluid minerals. However, there is no analysis whatsoever in the Draft RMPIEIS as to whether it is technologically feasible to develop fluid mineral resources in the planning area. For example, the document states that areas are available for oil and gas leasing, but subject to major constraints such as no surface occupancy (NSO). The Draft RMPIEIS further states that these areas can be accessed through directional drilling notwithstanding the NSO stipulation. The premise demonstrates a lack of understanding about directional drilling and furthermore, highlights the lack of consultation with knowledgeable petroleum engineers in the preparation of this document. Under section 102(2)(E) of NEPA, BLM is required to consider appropriate alternatives that will accomplish the intended purpose of the proposed action and are technically and economically feasible. 40 C.F.R. 1500.2(e); Headwaters, Inc. v. BLM, 914 F.2d 1174, 1180-81 (9th Cir. 1990); Colorado Mountain Club, 161 IBLA 371 (2004); Bales Ranch, Inc., 151 IBLA 353, 363 (2000). It is apparent that the Draft RMPIEIS did not consider whether directional drilling is technically feasible in this area given the geologic characteristics and the depth of the formations in the planning area. Because directional drilling is not technically or economically feasible, it would not accomplish the purpose of making these areas available to oil and gas development. Therefore, this is not an appropriate alternative for BLM to consider.	The Draft and Final RMP/EISs evaluate a range of alternatives to assure a balanced approach that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production is considered. The management actions proposed in the Proposed RMP/Final EIS are designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Directional or horizontal drilling is considered where possible and is one of many mitigation measures used in the planning area. However, directional drilling is not always possible given geology and certain technical issues. The drilling company in consultation with BLM ultimately decides the method of drilling.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Also, Instruction Memoranda 2004-089 sets forth BLM policy for developing the reasonably foreseeable development (RFD) for oil and natural gas development. This policy document requires BLM to perform an analysis using "petroleum engineering principles and practices and economies associated with discovering and producing oil and gas" when developing the RFD. The challenges associated with directional drilling would have been recognized had the RFD been properly developed. However, nowhere does the RFD consider technical	Please see general comment response #16

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		feasibility of directional drilling in the planning area and as such is an improper consideration for development of resources in the area.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Most importantly, because the decision to utilize directional drilling is a site specific determination, it should be left to the operator. Information about directional drilling is available from the State of Utah regulatory agencies which would have been analyzed had the BLM properly prepared the RFD. Analyses on directional drilling has been performed in the Vernal Planning Area by operators developing similar formations to the prospective areas covered by the Draft RMPIEIS. These analyses determined that it is normally not feasible to develop these areas through directional drilling. That being said, there are times when the particular geological configuration is such that directional drilling is possible. However, unless an operator acquires site specific information about the subsurface geology through seismic surveys (which requires surface occupancy!), and through actual drilling (which again requires surface occupancy) a determination about directional drilling is impossible.	Please see general comment response #16
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	The RFD is the foundation for planning fluid mineral development in the planning area. Because the RFD is wholly inadequate, the entire analysis for fluid mineral development is inadequate. Because the analysis is inadequate, the Draft EISIRMP fails to comply with federal laws and regulations thereby subjecting this document to legal challenges.	Please see general comment response #53
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	BLM's RFD scenario was based on a flawed analysis of the Mineral Potential Report that ignored significant data and grossly underestimated the production potential of the area. BLM's reliance on this flawed RFD analysis has resulted in a Draft RMPIEIS that violates the mandates of NEPA. It does not provide sufficient information to ensure that BLM can make a fully-informed and well considered decision. First, by underestimating the development potential of the BLM-administered lands in the region, BLM has failed to take a hard look at the social and economic impacts of reasonably foreseeable development activities within the area. Second, by relying on flawed data, and ignoring other significant data, BLM has failed to provide reasonable alternatives upon which to base its analysis. Finally, because BLM's alternatives analysis is flawed, its cumulative impacts analysis is also flawed. For each of these reasons, described in more detail below, BLM must reconsider its analysis in the Draft RMPIEIS, redraft these documents, and reopen the public comment period before it is in compliance with NEPA.	Appendix M in the Proposed RMP/Final EIS explains the RFD scenarios for the Proposed RMP/Final EIS. The RFD estimate is based on the most accurate information that BLM had at the time of report preparation. The RFD for the number of wells that will be drilled is the BLM's best estimate of what will occur in the future. This number can change widely due to factors which cannot be accurately determined including future prices of oil and gas, the success or failure of exploration in unproven areas, and new technology. If the number of wells or level of disturbance exceeds the RFD, BLM would be required to do further analysis.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	In the Draft RMPIEIS, BLM failed to properly consider cumulative impacts in accordance with NEPA. Specifically, the DEIS fails to disclose the true impact of the drilling restrictions on the ability of a lessee to develop its leases because the impacts of the various restrictions are examined separately, without any analysis of the cumulative effect of these restrictions. For example, BLM did not quantify: the amount of oil and gas resources that would not be developed due to these leasing restrictions, lost royalties and taxes, the cost to operators, or the effect that such restrictions would have on the price paid for the commodity by the consumer. Thus, it is apparent that BLM did not perform an adequate cumulative impacts analysis under NEPA.	Please see general comment response #52
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Because BLM failed to develop sufficient RFD scenarios and overlooked or otherwise failed to consider alternatives that reflected information required for a proper RFD analysis with regard to oil and gas development, BLM failed to consider a reasonable range of alternatives in accordance with NEPA. In sum, in addition to providing adequate RFD scenarios, BLM must reconsider its NEPA analysis in the Draft	Please see general comment response #53

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		RMPIEIS, redraft these documents to comply with NEPA, and then reopen the public comment period for this new draft.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	On page 4-406, the DEIS/RMP states there would be no significant impact to Minerals and Energy with respect to location and routing of pipelines. This statement is incorrect. The location and routing of pipelines can be a very significant economic impact to oil and gas operations, especially if significant deviations (and subsequent length of the pipeline) would be required.	The Proposed RMP/Final EIS indicates that restrictions on ROW corridors that limit the placement of roads, utilities, and facilities associated with mineral development could increase costs for the operator by altering the length, and routing of the ROWS.
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	Under Actions Common to All Alternatives at 2.8.5, Minerals and Energy Development, BLM indicates it will, "Acknowledge future development for coal resources in areas where coal bed natural gas development is taking place." On page 2-98, it is asserted that "BLM would identify priority energy resource in conflict areas to promote safe and efficient extraction of energy resources" and that "BLM would require dual resource leasing and development in the same areas." We have several concerns with respect to these statements: • It is unexplained what process BLM will use to "identify the priority energy resource in conflict areas." The parameters of such decisions must be established in the RMP and not deferred until a conflict arises. • Since dual leasing and development of coal and CBNG resources will be required in the same areas, has the Price Field Office adopted a policy to resolve potential conflicts between coal and CBNG? We strongly recommend that if such a policy has not been developed, one needs to be formulated with both the coal and natural gas industries' involvement. • BLM apparently fails to understand that the processes of developing coal and CBNG are not necessarily compatible and that it will be necessary to establish which lessee has priority rights over the other, e.g., first to lease, first to develop. Failure to settle the conflict issue in the RMP will likely result in future management problems and possibly needless litigation.	Please see general comment response #122
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	We object that the analyses and discussions contained in this Draft RMP do not take into account routinely applied mitigation measures. The manner in which environmental consequences is tantamount to a worst case scenario. Section 1502 of the Council on Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in the EIS which may be employed to reduce or entirely avoid impacts to other resource values. While this direction has apparently been construed to mean that only lease stipulations and other mitigation measures need be identified somewhere in the document, it is necessary to address all mitigation measures utilized during oil and gas exploration and development activities by incorporating them into the environmental consequences analysis. The Draft RMP does not address any type of mitigation until after it has described the worst case scenario. This does nothing more than fuel the flames of opposition to oil and gas activities. For example, no mention is made of the existing habitat enhancement fund that operators have been paying into for years. Monies from this fund have been used to improve big game habitat to offset current oil and natural gas activities. Additionally, the statement that runoff from roads would cause increased erosion impacting water quality and increasing sedimentation in streams is excessive because industry has typically engineered its roads to eliminate these impacts. It is crucial for mitigation measures to be acknowledged in the effects analysis to show that oil and gas activities	The impact analysis in the Proposed RMP/Final EIS analyzes the effectiveness of mitigation measures.

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		are mitigated and are actually compatible with other resource uses, including those in sensitive areas. Therefore, it is necessary for this chapter to be revised in order to incorporate mitigation measures in the cumulative effects and environmental consequences analyses.	
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	BLM claims in Appendix 23 to acknowledge the Presidents National Energy Policy which directs BLM 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). However, BLM merely identified the volumetric data in the Affected Environment section of the DEIS, prepared a RFD scenario, included mineral data in the Analysis of the Management Situation (AMS) and outlined lease stipulations by alternative. While this information is relevant, BLM has clearly missed the intent of Instruction Memorandum 2003-137 which is to balance environmentally responsible energy development with sensitive resources. Nowhere in the DEIS has BLM demonstrated that it actually utilized this information in the land use planning process, e.g., ensuring that access and availability of the public land for energy resources are not unduly restricted. We strongly recommend that BLM adjust its analysis and proposed decisions based upon the information gained through the EPCA study. Specifically, it is incumbent upon BLM to eliminate unnecessary restrictions from the RMPIDEIS in accordance with the EPCA findings.	Please see general comment response #52
Independent Petroleum Association of Mountain States (IPAMS)	Minerals and Energy Resources	In a time when our Nation desperately needs more affordable natural gas, I hope that every attempt will be made to accommodate responsible development in areas where the resource exits. Since the federal government own more than half of the natural gas in this country, it is imperative that BLM recognize the consequence (both positive and negative) that its management will have on the Nation's energy supply. Through the excellent efforts of the BLM, it has been clearly demonstrated that natural gas development can occur in harmony with other resource values (Wildlife, Scenic Areas, Recreation, etc.). I commend you for your ongoing efforts to continue the legacy of multiple use that has made our country so strong.	Please see general comment responses #18 and #45
Independent Petroleum Association of Mountain States (IPAMS)	Paleontology	BLM directs on page 2-37 that an assessment of fossil resources will be required on a case-by-case basis and that mitigation deemed necessary must be performed before and/or during the surface disturbing activity. It is essential for BLM to consider avoidance of fossil resources as the primary mitigation tool and that only if a fossil site cannot be avoided other mitigation measures could be utilized.	Page 4-122 notes that the BLM's preferred mitigation measure for protecting significant paleontological resources is avoidance.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	Section 201(a) of FLPMA provides that "the Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values . . .." 43 U.S.C. § 1711(a). The purpose of keeping this inventory current is "to reflect changes in conditions and to identify new and emerging resources and other values." Id. As explained in the legislative history of this provision, the purpose of this section of FLPMA is to ensure that BLM, before undertaking the land use planning required by Section 202, has the requisite basic knowledge about the land and its resources, including all the economic, social, and environmental demands for its use. S. Rep. No. 94-583, at 43 (1975); see also Great Basin Mine Watch, 159 IBLA 324 (2003) (explaining FLPMA's land use planning requirement and related BLM implementing regulations). As detailed below, the BLM PFO did not have the requisite basic knowledge about mineral resources in the planning area before undertaking the land use planning process	Please see general comment response #1
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	A fundamental flaw in the DEIS is the complete lack of a basic foundation for making future decisions. It is of serious concern that the planning document does not adequately offer objectives upon which to base future activities. According to BLM's Manual on Land Use Planning, the land use planning process is the key tool used to protect resources and designate uses on Federal lands managed by the BLM. See BLM Land Use Planning	Section 2.3 of the Proposed RMP/Final EIS presents goals and objectives for resources and uses under each alternative analyzed in detail, as well as decisions for allocating and managing

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		Manual 1601.01. As such, planning has been deemed critical to ensuring a coordinated, consistent approach to managing these lands. This Manual also requires land use plans to express desired outcomes and actions needed to achieve them. According to the BLM Planning Handbook, land use plans must identify uses, or allocations, that are allowable on the public lands and mineral estate. These allocations identify surface lands and/or subsurface mineral interests where uses are allowed. Most importantly, the land use plan must set the stage for identifying site-specific resource use levels. The DEIS fails to meet this requirement, not only through an inadequate Reasonably Foreseeable Development scenario for oil and gas activities (which is discussed below) but also through a lack of land use allocations. The DEIS simply identifies restrictions without any apparent consideration or description of expected future uses. As such, it will be impossible for the agency to tier off the analysis in the RMP when conducting NEPA compliance documents for future activities. Therefore, the plan must be restructured to include these elements to avoid unnecessarily extensive and costly project level NEPA documentation.	resources and uses. The Land Use Planning Handbook, H-1601-1, requires consideration of many factors in the development of alternatives (i.e. meet the purpose and need for the action; meet the goals and objectives for the plan; can be feasibly carried out based on cost, logistics, technology, and social and environmental factors; represents a different land use plan that addresses and/or resolves the planning issues; decisions may be common to some or all of the alternatives; components of each individual alternative must be complementary; and developed in an open, collaborative manner to the extent possible). With cooperators assistance and public input, BLM has met the handbook requirements. Also see general comment response #48.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	In many areas (as demonstrated in our specific comments), the Draft RMPIEIS provides insufficient information with respect to the BLM's proposed decisions. In many cases the proposed decisions are not supported by any reasonable rationale (e.g., NSO buffers for wildlife without rationale); therefore, BLM's proposed decisions appear capricious.	Section 2.3 of the Proposed RMP/Final EIS presents the goals and objectives for each of the alternatives including the Proposed RMP. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels resource use.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	There are numerous aspects of the Draft RMPIEIS which will result in detrimental impacts on future oil and gas leasing, exploration and development activities. Despite the fact the DEIS is unnecessarily voluminous due to repetitious material, it fails to provide the requisite analysis necessary to justify resource management proposals and in particular, restrictive management proposals that differ from current management. (Examples of these deficiencies are detailed in the comments below.) We are obligated to bring to BLM's attention that this arrant lack of detail is a fatal flaw in the DEIS and must be appropriately included in a supplemental DEIS. For example, the document relies upon a myriad of tables to explain its management by alternative. However, BLM's reliance on a single sentence with respect to such management does not constitute analysis. Indeed, a federal appeals court has found similar perfunctory analysis in an RMP EIS to violate NEPA. Kern v. U.S. Bureau of Land Mgmt., 284 F.3d 1062, 1073-74 (9th Cir. 2002) (finding a two sentence "analysis" in an RMP EIS to be inadequate under NEPA because guidelines that the EIS attempted to tier to were never subject to NEPA review and statement was merely a promise to perform site-specific analysis for future projects).	Please see general comment response #123
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	There is a critical need for legal authorities (statutes, regulations, policies, and guidelines) to be identified as well as discussion as to why specific management has been proposed in accordance with each alternative based upon desired future conditions and changes in existing resource conditions.	Chapter 1 of the Proposed RMP/Final EIS explains the purpose and need for planning and presents a discussion of relationships to land use plans,

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			programs and policies. Compliance with other laws is addressed in Chapter 2 in the descriptions of the alternatives and in the analysis in Chapter 4.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	NEPA's implementing regulations define the human environment to social and economic effects. NEPA requires agencies to take a "hard look" at the environmental consequences of the proposed action and prescribes public dissemination of relevant environmental information. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 (1989). By basing its analysis on flawed data, and ignoring significant information on oil and gas resources in the area, BLM has overlooked substantial development potential of the public lands in the region. Because it failed to even acknowledge this development potential, BLM necessarily has not taken a "hard look" for this development and has simultaneously failed to consider the social and economic impacts of not realizing this potential. Accordingly, BLM has failed to comply with NEPA's hard look requirement.	Section 4.6 of the Proposed RMP/Final EIS analyzes to the extent possible, the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. The analysis considers important assumptions regarding the redistribution of earnings in local economies from mineral and energy development. See general comment responses #49, #51, #52, and #132.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	BLM indicates on page 1-17 that collaborative management is a priority. Consequently, BLM will seek to "increase the use of citizen and organizational volunteers to provide greater monitoring of resource conditions under site-stewardship programs and to complete on-the-ground developments for resource management and human use and enjoyment." While we recognize that the use of public or organizational volunteers may be of interest to BLM due to budget and staffing constraints, the use of volunteers must be very strictly scrutinized before being employed. BLM must confirm that such volunteers have a proven high level of specific expertise prior to their being selected to conduct scientific assessments of resource conditions or activities.	Volunteer activities are directed by employees with expertise in carrying out the specific tasks being performed.
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	In addition, BLM states "where it is found mutually advantageous, BLM would enter into cooperative agreements or memorandums of understanding with federal, state, local, tribal, and private entities to manage lands or programs consistent with the goals and objectives of this RMP." [Emphasis added.] We are unaware of any authority whereby BLM can relinquish its management responsibilities to nonfederal entities, particularly private ones. While it may be possible for BLM to allow another federal agency to take jurisdiction over a BLM program, it is highly doubtful whether BLM can legally transfer such responsibilities to a private party. We recommend that absent legal justification for such a program, BLM eliminate its proposal to relinquish its management responsibilities to private entities.	Section 1.10 of the Draft RMP/EIS stated,"…where it is found mutually advantageous, BLM would enter into cooperative agreements or memorandums of understanding with federal, state, local, tribal, and private entities to manage lands or programs consistent with the goals and objectives of this RMP." This wording does not indicate that management of public lands would be relinquished or turned over to other entities, but indicates that BLM would cooperate with these entities in the management of the public lands. The authority to enter into such agreements is Section 307(b) of the Federal Land Policy and Management Act (FLPMA) which state that "Subject to the provisions of applicable law, the Secretary may enter into contracts and cooperative agreements involving the management, protection, development, and sale of public lands."
Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	BLM's mission is to promote multiple use of public lands; yet, BLM has selected Alternative D, the most restrictive of the Alternatives, as its Preferred Alternative. Clearly, selection of Alternative D as the Preferred Alternative illustrates a bias against energy and minerals.	Please see general comment response #1

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Independent Petroleum Association of Mountain States (IPAMS)	Process and Procedures	In many areas (as outlined in our specific comments), the Draft RMPIEIS provides insufficient information and justification for its proposed decisions. Moreover, since the majority of proposed decisions are not supported by any reasonable rationale (as specifically identified in these comments), BLM's proposed decisions appear arbitrary and capricious. We, therefore, strongly urge BLM to revise and re-publish the Draft RMPIEIS incorporating recommendations in these comments so that sufficient information is presented to justify the proposed decisions under each alternative and adequate information on how the proposal would be implemented can be reviewed.	Section 2.3 of the Proposed RMP/Final EIS presents the goals and objectives for each of the alternatives including the Proposed RMP. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels resource use.
Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	The DEIS Fails to Conduct a Sufficient Socio-Economic Analysis Under FLPMA and, NEPA: Upon review, the DEIS fails to effectively address the full realm of positive economic benefits associated with current and future oil and gas activities. For example, under the No Action Alternative, it is projected that an additional $49 million will be spent annually to drill and complete coalbed natural gas along with conventional natural gas wells within the Field Office. It appears this figure is merely based upon goods and services as well as part-time and full-time jobs as related to the Reasonably Foreseeable Development scenario. What appears to have been excluded is the highly significant state and local revenue generated due to a variety of taxes paid to the state and local governments. Another major contribution to the economy made by the oil and gas industry is payments to the federal government, 50 percent of which is returned to the state which apportions appropriate revenue to counties, in the form of federal lease rentals, lease bonus payments, and royalties generated from federal activities on public lands. Finally, the role of BLM lands in meeting the national energy demand must be considered. Natural gas is an extremely inelastic commodity. Small decreases in supply cause large increases in the price paid by consumers. Public lands supply nearly 10 percent of country's current natural gas supply and are the greatest source of future domestic supplies of natural gas. BLM must quantify the economic consequence of restricting supply through land management policy.	See general comment responses #132. In 2007, Carbon and Emery Counties provided 0.2% of Utah's total oil production and 28.5 % of Utah's total gas production (DOGM, 2006). Utah ranks 12th nationally in oil production and 10th nationally in gas production (DOGM, 2008). For natural gas, Carbon and Emery Counties accounted for 0.45 % of total US production in 2007. Sources: DOGM, 2008; http://tonto.eia.doe.gov/dnav/ng/ng_sum_top.asp This suggests that production in the Price Field Office, although important to the local economy, is not as critical to domestic gas supplies as the commentor suggests.
Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	Section 1.9 (Property Valuation and Taxation) of the Baseline Socioeconomic Profile concludes that 18 percent of local government tax revenue is attributable to mineral production. Table 1.9 of the report shows that over half of all mineral valuation is attributable to oil and gas extraction. Considering more recent property tax statistics for Carbon County specifically, over 27 percent of 2003 property tax revenue was attributable to oil and gas. On page 4-575, the Draft RMPIEIS states that the socioeconomic analysis was based in part on the assumption that "Tax revenues derived from activities on BLM lands would continue to have fiscal implications for communities in the study area." Yet, the socioeconomic analysis contained in Section 4.12 of the Draft PFO RMPIEIS, does not adequately describe the long-term incremental and cumulative differences in public sector revenues of the different alternatives on this important source of county revenue.	Section 3.6 of the Proposed RMP/Final EIS has also been re-edited to include an assessment of public finance and government services from having access to BLM lands for multiple uses. This includes an analysis of how BLM lands and federal mineral estate managed within Emery and Carbon Counties affect local, state, and federal government budgets and expenditures from mineral royalties, taxes, Payment in Lieu of Taxes, fees and other revenues. Potential impacts to public finance and government services from mineral revues under each alternative will be considered are discussed in Chapter 4, section 4.6.

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Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	Property taxes are not the only natural gas related tax revenues that accrue to local governments. Natural gas-related sales and use taxes also flow to local governments and help finance public services. Between 1995 and 2003, the period when the pace of oil and gas drilling increased in the Price District, total annual gross taxable retail purchases have increased by more than $82 million (33%) in Carbon County and $45 million (77%), even as population declined. The oil and gas industry has made significant contributions to that growth, both directly and indirectly. Yet the RMPIEIS does not estimate this contribution or project the impacts of each alternative on sales and use tax revenues.	Section 4.6 of Chapter 4 uses the IMPLAN model to estimate the impacts of oil and gas related expenditures to changes in income and employment in the Price planning area. Positive increases in income and employment typically lead to increases in spending at the local level. The BLM, however, has no means to segregate the specific impacts on local sales and use taxes from increases in employment and income in the minerals sectors. This is especially problematic in an industry where not all the employment and income effects are local.
Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	The PFO Draft RMPIEIS uses the IMPLAN model to assess economic impacts of the various alternatives, but the document does not report all of the results. In addition to employment and earnings, the IMPLAN model projects the total economic impact of specific economic inputs. These total economic activity estimates have been routinely presented in other NEPA assessments conducted by the BLM, but they have been omitted in the PFO Draft RMPIEIS.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, Section 4.6. An additional socioeconomic technical description document which details the methodology, calculations, results and all sources used is provided. This technical document reports the total economic impact estimates including direct, indirect, and induced results.
Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	Page 4-578 of the Draft RMPIEIS states that for the IMPLAN assessment, an assumption was made that, based on a previous study of gas drilling in Carbon and Emery counties, only 40 percent of direct expenditures would occur locally. The economic analysis contained in the Draft RMPIEIS only addressed Carbon and Emery counties, which means that fully 60 percent of the economic effects of oil and gas drilling associated with the various alternatives are not captured by the IMPLAN modeling process conducted for this assessment. In other areas of the country, the BLM has recognized this phenomenon by taking a regional approach to defining the area of influence and to the economic modeling of resource development alternatives. Given that much of the oil and gas service industry infrastructure is located in Vernal, it seems that the City of Vernal, the State of Utah and perhaps other entities would have a keen interest in the regional economic effects of PFO resource alternatives. The nature and scale of those effects warrant discussion in the Draft RMPIEIS.	IMPLAN uses the assumption that only 40 percent of direct expenditures would occur locally in Emery and Carbon counties. This means the other 60 percent of direct expenditure is assumed to occur outside the Emery and Carbon counties such as the city of Vernal. Thus, 100 percent of the direct expenditure economic effects from oil and gas drilling associated with the various alternatives is captured by IMPLAN.
Independent Petroleum Association of Mountain States (IPAMS)	Socioeconomics	Of greatest concern, however, is the failure of BLM to take economic impacts, either positive or negative, into consideration during the land use decision process. Specifically, BLM has failed to consider economic impacts in identifying and evaluating management alternatives and in particular the preferred alternative. Despite what many field managers believe, the federal government has an obligation to state and local governments to ensure their economies will not be severely adversely affected by federal land management policies.	See general comment responses #2 and #132
Independent Petroleum	Soil, Water and Riparian	Soil, Water, and Riparian Resources	Please see general comment response #70

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Association of Mountain States (IPAMS)		Under Establishment of Buffer Zones for No Surface Disturbance around Riparian-Wetland Habitats within Alternative C, new surface disturbance would be prohibited within the 100-year floodplain or within 100 meters on either side of the centerline along all perennial and intermittent streams. We strongly object to the application of this decision to intermittent streams. An intermittent stream in Utah can sometimes consist of a drainage that carries storm water only once a year. Streamside is sometimes the only possible location for placement of a mineral material pipeline, access road or facility, To deny placement of such a pipeline, road or facility within the floodplain of an intermittent stream without site-specific inspection justification for doing so is improper. We strongly recommend that BLM drop any decision regarding NSO near intermittent streams.	
Independent Petroleum Association of Mountain States (IPAMS)	Special Status Species	BLM's first Significance Criteria for Special Status Species states "Any surface disturbance and/or human activity within potential or occupied habitat, including designated critical habitat, for a federally listed species may be significant and would require consultation with USFWS." There are several federally listed species for which potential habitats have been identified, mapped or modeled over wide expanses of BLM lands, but have not been confirmed. For example, Mexican spotted owl habitat has been modeled as occurring over much of Utah. In reality, actual habitat (when groundtruthed) is more limited in magnitude. There have been several ground-truthing surveys conducted in the Price Field Office that have determined areas mapped as potential Mexican spotted owl habitat where nesting and hunting habitat elements do not actually occur. Furthermore, implementation of this criterion as a metric of significance would have a direct impact on energy and mineral leasing and development by potentially triggering the EIS process where a DNA, Categorical Exclusion or EA may actually suffice. BLM must either eliminate this criterion or modify it so that it provides opportunity for the energy and mineral industry (and other public land users) to verify the occurrence of threatened or endangered species (T&E) habitats or populations prior to BLM determining a proposed action as having a significant impact.	The language included in the Special Status Species Impacts section of the Proposed RMP/Final EIS (section 4.2.7) does not include the significance criteria. An analysis assumption has been included that indicates that the U.S. Fish and Wildlife Service would be consulted on any actions with the potential to affect federally listed species or designated critical habitat. EISs would be required only if, after application of mitigating measures, the residual impacts remain potentially significant.
Independent Petroleum Association of Mountain States (IPAMS)	Special Status Species	The first bulleted Action Common to All Alternatives under Special Status Species (Chapters 2 and 4) states that BLM would "follow guidelines and implement management recommendations presented in species recovery or conservation plans... or alternative management strategies developed in consultation with the USFWS." Many of the existing species USFWS recovery and/or conservation plans (e.g., southwestern willow flycatcher Recovery Plan) are outdated, containing misinformation about species habitats and known populations, We caution BLM to ensure that prior to implementing any management action(s) from existing recovery or conservation plans, BLM make sure the actions it would be implementing are appropriate and are specific to currently known habitats or populations of special status species. It is also necessary for BLM to work with the USFWS to provide information needed to update existing recovery or conservation plans to verify BLM actions are not applied in areas that do not support habitat for or populations of special status species.	Please see general comment response #64
Independent Petroleum Association of Mountain States (IPAMS)	Special Status Species	The second bulleted Action Common to All Alternatives (Chapters 2 and 4) under Special Status Species states "Prohibit surface disturbance within known populations or potential habitats of plants or animals (Threatened, Endangered, or Candidate) without consultation or conference..." As explained above, there are several species listed under the Endangered Species Act (ESA) for which potential habitat has been identified, mapped or modeled over wide expanses of BLM lands (including the Price Field Office), but have not been confirmed. For example, potential Mexican spotted owl habitat has been modeled as occurring over much of Utah. Similarly, the	The language included in the Special Status Species Impacts section of the Proposed RMP/Final EIS (section 4.2.7) does not include significance criteria. An analysis assumption has been included that indicates that the U.S. Fish and Wildlife Service would be consulted on any actions

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		southwestern willow flycatcher is cited in its Recovery Plan as occurring in riparian habitats, which occur throughout much of the Price Field Office. In point of fact, nesting and hunting/foraging habitats for these two species are more limited in scope. Implementation of this Action Common to All would have a direct negative impact on the energy and mineral industry by potentially slowing or halting exploration and production activities on lands where T&E species' habitat has been theoretically identified, but not confirmed. BLM must modify this Action Common to All so that it is practical and provides opportunity for the energy and mineral industry (and other public land users) to verify the occurrence of T&E habitats or populations prior to the initiation of the lengthy Consultation or Conference process.	with the potential to affect federally listed species or designated critical habitat. The analysis of impacts on oil and gas from other resource programs has been expanded in the Proposed RMP/Final EIS.
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	There appear to be numerous errors in Appendix 8 that contradict information provided in the text of the DEIS. It is necessary to correct Appendix 8 so that it is consistent with the information in the text of the EIS. Furthermore, Appendix 8 should be revised to incorporate our specific suggestions and comments in the following sections. For any measures carried forward in Appendix 8 of a re-drafted RMPIEIS and Final RMPIEIS, it is necessary for Appendix 8 to include descriptions of exception, waiver and modification opportunity under each seasonal restriction and NSO stipulation (not in a separate Appendix document).	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	The exception and modification processes outlined in Appendix 16 do not provide sufficient information for effective comment by the public. Many of the stipulations and exception criteria in Appendix 16 conflict with those presented in Appendix 8. Furthermore, the process for exceptions, modifications and waivers in Appendix 16 are inappropriate. For example, Appendix 16 indicates that waivers will not be granted for most seasonal wildlife conservation restrictions. This approach ignores the fact that there are numerous occasions when an exception to a seasonal or spatial restriction is entirely appropriate. We have provided four examples: Example 1: When winter conditions are mild and big game have not yet moved down to wintering grounds or have already moved up to summering grounds. Example 2: When a project area falls within mapped or modeled high-value habitat for a particular species, but based on field surveys or ground-truthing, the specific location of the proposed development does not actually support the high-value habitat elements. Example 3: When a project area supports mapped or modeled high-value habitat for a particular species, but the species of concern has never been documented there and is not documented upon field surveys. Example 4: When a project, such as a multiwell directional drilling location simply cannot be completed within the stipulated drilling window. It is imperative that Appendix 16 be rewritten. Rather than instituting blanket stipulations, it is crucial that BLM commit to develop Stipulations for Surface-Disturbing Activities for Oil and Gas Leasing (as well as the associated exception, waiver and modification criteria) in cooperation with the oil and gas industry, other participating agencies, and other key stakeholders. Before adopting any such stipulations, BLM must conduct a valid socioeconomic impact analysis of any proposed stipulations and incorporate these findings into the decision making process. Given the importance of energy resources BLM must also monitor to determine the effectiveness and necessity of these stipulations.	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	The eleventh bulleted Action Common to All Alternatives in this section (Chapters 2 and 4) states "allow or participate in research of all wildlife species and their habitats." We strongly urge BLM to invite the energy and mineral industry to participate in such research. As a whole, the industry has demonstrated an interest in and dedication to species conservation (e.g., through self-imposed timing limitations, relocation of facilities, and	The BLM acknowledges the past beneficial participation of members of the energy and mineral industry in projects with the BLM. In the future the BLM would invite all interested and affected entities

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		funding of habitat improvements, etc.). Participation in this Action Common to All Alternatives would allow the industry the opportunity to have a direct, beneficial impact on plant and wildlife resources through contributions to research projects and providing input on the types of research that would benefit public land users.	to jointly plan and participate in resource projects where BLM is the lead agency.
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Fish and Wildlife: Under the significance criteria described on page 4-155, the Draft RMPIEIS states "cumulative loss of 25 acres or more of crucial habitat through surface disturbance or other human-caused activities rendering an equivalent amount of acreage unsuitable, and where restoration or replacement may not be possible would be a significant loss of habitat." This outwardly arbitrary decision to label 25 acres of crucial habitat disturbance a "significant" loss is objectionable for two reasons: 1) Determining the significance of habitat disturbance, fragmentation or loss is a site-specific and land use-specific judgment that is based, in part, on the extent of similar habitats within the immediate and surrounding area, the status of the fish or wildlife population(s) that are using and are affected by that specific habitat, and the type/magnitude/timing of the land use activity that is proposed within the crucial habitat; and 2) All energy and mineral actions on BLM lands go through the NEPA process, requiring at a minimum an environmental assessment level of analysis. Under N EPA, determination of a "significant" impact has a severe effect on a proposed public land activity by triggering the need for an environmental impact statement, which is a much lengthier and costly analysis process under NEPA. if for example, an oil and gas project is to propose 30 acres of disturbance on elk crucial habitat, it can be concluded that the project would have to undergo an environmental impact statement. Therefore, we strongly object to the arbitrary designation of 25 acres as the significance threshold for crucial habitats. The Draft RMPIEIS needs to be revised to more clearly define its intent under this description of Significance Criteria.	Significance criteria have not been included in the Final Proposed RMP/EIS. The context and intensity of impacts have been provided to describe the significance of impacts.
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Within this category, the alternative-specific decisions of the Draft RMPIEIS discuss implementation of all or some of the Seasonal Closures in Appendix 8 (Spatial and Seasonal Wildlife Conservation Measures). Overall, several of the stipulations contained within Appendix 8 are imposed without sufficient information to explain why they should be implemented. Our specific reasons for this criticism are provided in the following statements:	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Appendix 8 indicates NSO stipulations should be applied within 0.5 miles of nests occupied within the last 3 years for both cliff nesting complexes and known nest sites. Adoption of this measure under any alternative is unacceptable. BLM has not provided any analysis on the effects of oil and gas (or other land uses) on breeding and nesting activities. Based on the success of numerous nests within close proximity to operational oil and gas facilities, seasonal restrictions and timing limitations of surface-disturbing activities around active nests, rather than NSO, can result in minimal impact to nesting raptors from oil and gas development. As such, it is appropriate for timing limitations to be used, rather than NSO, on oil and gas development within 1/2 mile of known raptor nest sites. Furthermore, it is essential for BLM to implement exception, waiver, modification criteria that would allow surface disturbance during the timing limitation provided the nest is protected from visual and/or noise impacts by topography and/or vegetative screening, or once young raptors have successfully fledged the respective nest,	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	• It also appears that the above-described decision for raptor nests contradicts the information presented in Appendix 7 (Best Management Practices for Raptors and Associated Habitats), which discusses a 7-year monitoring period (instead of 3 years). The allowance for permanent structures under this stipulation is unclear because it implies that if a nest becomes active any time during that 7-year period, then surface structures must be removed. No information has been provided showing the current practice of a 3-year monitoring period,	Please see general comment response #59

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		coupled with timing limitations, is insufficient for protecting raptor-nesting activities. BLM needs to correct any discrepancy that exists between this measure and Appendix 7 by voiding the 7-year monitoring period recommendation.	
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Appendix 8 includes a seasonal restriction of April 15 through August 1 in high-value breeding habitats for neotropical migratory birds. We object to adoption of this measure under any alternative for three primary reasons: 1) Appendix 8 does not provide an associated spatial restriction or map(s) of high-value breeding habitats to which the seasonal restriction would be applied; 2) There is no description of how the "special stipulation" would be applied under the No Action Alternative or Alternatives A, B, and C; and 3) The Price Field Office provides diverse and extensive habitats for neotropical migratory birds. Using Distribution Maps provided on the Utah Division of Wildlife Resources website, between the American robin, black-billed magpie, sage sparrow, and yellow-rumped warbler, the entire Price Field Office is mapped as either critical value or high value habitat for just these four species! As such, almost any area in the PFO could be designated as high-value breeding habitat for one or more bird species, which would thereby trigger implementation of NSO timing limitations.	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Similarly, Appendix 8 includes a seasonal restriction of March 1 through July 1 in crucial white-tailed prairie dog colonies. First, no map has been provided detailing what qualifies as a crucial white-tailed prairie dog colony. Therefore it is unclear whether this measure applies only to occupied prairie dog colonies or historic colonies as well. The document then describes how this would be applied as either a "special stipulation" or as NSO under the different alternatives. Yet again, no spatial parameters are provided for the NSO and no description of what the "special stipulation" would be. Adoption of this stipulation is unreasonable until the public has had an opportunity to comment on the specifics of this measure and changes are made.	Please see general comment response #41
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Appendix 8 contains proposals to expand seasonal restrictions for mule deer and elk to include not just critical value and high-value habitat, but also "substantial" and "limited-value" habitat. Adoption of this measure is objectionable for two primary reasons: 1) BLM has failed to provide sufficient rationale for why seasonal restrictions are needed in substantial or limited-value habitats. In many areas (including in critical and high-value), oil and gas development and operations have been observed as being compatible with mule deer and elk habitat use provided measures are taken to protect crucial habitat types and important seasons of use (e.g., fawning or calving periods). 2) Seasonal restrictions in lower value big game habitats will further reduce lands available for oil and gas exploration and production, which will prevent oil and gas operators from being able to exercise their valid existing lease rights and lease obligations.	Please see general comment response #41
Independent Petroleum Association of Mountain	Wildlife and Fish	• We recommend that BLM re-evaluate many of the proposed stipulations in Appendix 8 and revise the Draft RMPIEIS so that sufficient information is presented to the public on: 1) The spatial NSO restrictions that would be applied;	Please see general comment response #41

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States (IPAMS)		2) Justification for why these measures are needed; 3) Detailed information on opportunities for exceptions to NSO or timing limitation stipulations; 4) The socioeconomic impact of these restrictions.	
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Management of Migratory Birds: The decision under this section indicates BLM would continue to "conserve habitat for all migratory birds..." The impact analysis for this decision is missing from the DEIS. BLM must disclose the impacts that the proposed conservation of migratory bird habitats will have on public land uses. In this analysis, BLM is required to specifically address the conditions, requirements, stipulations that would comprise the proposed conservation, and provide a realistic analysis on how those conservation measures would affect the energy and mineral industry (and other land uses). It is also necessary for the public to be given an opportunity to review and comment on this aspect of the Draft RMP/EIS.	Analysis of the impacts of the alternatives on migratory birds is included in Chapter 4 of the Proposed RMP/Final EIS.
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Raptor Habitat Management: Under Alternatives B, C and D, BLM would implement Best Management Practices (BMP) and/or Site Specific Analysis/Raptor Nest Site Buffer Zone Guidelines as identified in Appendix 7. This is in contrast to the No Action Alternative, which would follow management in the existing Price RMP and SRRMP. The Impact Analysis states that implementation of Alternatives B, C, or D would have "no significant impact" on energy and minerals. Many of the spatial and temporal restrictions are more stringent than those provided in the existing Price RMP and SRRMP. As adoption of many of the new BMPs for raptors and raptor habitats are more stringent, they would have a greater impact on the timing and available locations for oil and gas activity. Therefore, it is patently false to say that the new BMPs would have no significant impact on energy and minerals. BLM needs to revise its analysis to clearly reflect these impacts.	Please see general comment response #44
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Under Alternatives A, B, C, and D BLM would "manage land uses within occupied and historic prairie dog colonies to preserve the habitat values of these limited but crucial value habitats." As with other proposed decisions, BLM must clearly define the constraints of this proposed decision, particularly when the Impact Analysis states that it would have "no significant impact" on energy and minerals. BLM must identify the conditions, requirements, stipulations that would comprise the proposed management of land uses. BLM must also describe how it would manage land uses in occupied prairie dog colonies versus historic colonies. If these conditions, requirements or stipulations prohibit or limit energy and mineral development, we strongly object to implementation of this decision, particularly if the decision is going to apply to historic colonies.	For all action alternatives, Table 2.8 of the Proposed RMP/Final EIS states: "Manage land uses within occupied and historic white-tailed prairie dog colonies to preserve the habitat." The effects on mineral and energy development from implementing restrictions and stipulations that limit areas and time available for resource development are addressed in Chapter 4 of the Proposed RMP/Final EIS.
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Introduction, Transplantation, Augmentation, and Reestablishment of Fish and Wildlife Species: Under this category, BLM proposes a decision to augment selected established native and nonnative species populations. Under Alternative D, "supplemental releases of game birds and fishes would continue without requiring additional documentation in the RMP or additional NEPA analysis." While in general we support the continued release of established fish and wildlife species as an effective contribution towards species conservation, releases of fish and game birds could potentially have an adverse effect on the energy and mineral industry. For example, releases of sage grouse and subsequent establishment of a new lek could trigger NSO stipulations and timing limitations in areas where they previously were not needed. As such, we recommend that BLM refine its direction so that if a proposed reintroduction would have an impact on public land uses (including energy and minerals), additional NEPA analysis would be conducted so that the industry and other publics have the opportunity to provide comments.	Please see general comment response #8

Organization	Category	Comment	Response
Independent Petroleum Association of Mountain States (IPAMS)	Wildlife and Fish	Off-Site Mitigation: We support the elimination of mandatory 1:1 acre-for-acre off-site mitigation for any action that would result in surface disturbance to crucial value habitats. However, this statement is inconsistent with Appendix 8, Spatial and Seasonal Wildlife Conservation Measures, where it is stated that 1:1 off-site mitigation is required for mule deer/elk crucial winter habitat and Rocky Mountain and Desert bighorn sheep. Revision of Appendix 8 is necessary. The RMP/EIS is silent concerning what could or would occur in the absence of off-site mitigation. However, we strongly object to wording such as "BLM would encourage willing partners to participate in off-site mitigation strategies" because it could lead to "BLM arm-twisting" if companies would not volunteer this type of effort. It would be more appropriate to include wording such as "BLM and applicable land users would consider and evaluate off-site mitigation as one of multiple options to mitigate adverse impacts to crucial value habitats."	Please see general comment response #43
King Crawlers (Price)	OHV Route Identification	To complicate the implementation of this new management plan is the lack of route designations. How can you put these management layers in place without first having a travel plan? No matter how well intended, this plan would have undesirable results and even if all existing routes were left open, eventually many important routes would be closed because of a pervious imposed restriction. This is like having the cart before the horse, isn't it? From our point of view the soonest a reasonable travel plan could be set in place is two to three years. There should be serious discussion of postponing any changes without a travel plan to present. The preferred alterative "D" for OHV route designations is a good example of either a major oversight, total lack of understanding or a bias of the needs of the OHV community. Not a single trail or road that was submitted to the BLM by off road user groups was shown on the map. This is reminiscent of the trails that where submitted during the San Rafael Travel Plan process, they were totally left off the map and out of the discussion even though many promises were made about their inclusion... The alterative "D" for OHV route designations included around 150 miles of paved roads. Apparently the BLM does not understand it is against the law to ride such vehicles on these types of roads. If the BLM would employ a recreation specialist that has a back ground in motorized off road recreation and was concerned about their continued use, perhaps problems like these could be avoided. With the increasing use of OHVs perhaps it would be appropriate, to suggest, the BLM add a whole new department dealing specifically with off road vehicles usage... G2- The area east of Hwy 24, north of the Emery County line, south of the San Rafael River and west of the county road which parallels the Green River should be designed as an open riding area and the small closed areas within be removed. See map G-2... A2- There are three routes in the Behind the Reef Road area that have been adopted by three different motorized user groups and have signed agreements with the BLM to help in their maintenance and monitoring. These routes pass through ROS class Semi-Primitive Non-Motorized. We feel this area should be changed to ROS Semi-Primitive Motorized. See Map A-1... A3- This spring about half of Behind the Reef Road was graded by mistake. Unfortunately it destroyed much of the riding valve of this trail. To mitigate some of the losses we are asking the BLM to reopen the Bell Mining Loop. See Map A-2 A4- The route from Ramp Canyon to the county road which passes the staging area for Quandary Canyon is limited to vehicles under 52" width. It is used by a large number of hikers and should be reopened to full sized vehicles. There is not room at the county road for parking. See Map A-3... A6- We are asking that the old county road to Hidden Splendor Mine be reopened. It would break up the long 30 mile ride back to Temple Mountain after ridding the Behind the Reef Road, on an ATV. This route would also eliminate most of the tight turns on the many county road in this area and the potential for head on encounters with full sized vehicles. See Map A-5.	See general comment responses #15, #19, #20 and #31

Organization	Category	Comment	Response
		A-7 When the San Rafael Travel Plan was put into place an important link was left out. There is a route from Temple Mountain to I-70 between the Reef and Hwy 24. Most all of this route is presently open other than a five mile segment, two of which are part of the old Hanksville road. If this route was reopened a large loop could again be utilized by ATV's. All five miles of this route are old roads. See Map A-6. A8- We are asking that some of the trails in the Temple Mountain Trail System be reopened to other vehicles than motorcycles. Allow vehicles under 52" to use the Blue, Green, Orange and Victor trails. Most of these trails are old roads and could easily accommodate ATV's. Reopen Lone Man and Home Base Link routes to full sized vehicles. Reopen the Purple Trail to motorcycles. These changes would greatly enhance this trail system and would add to the continuity and flow of the users. See Map A-7. A8- Designate a trail system in the Rods Valley, Family Butte area for all vehicles. There is a number of old mining roads already open and we feel that making this type of designation would take some of the pressure off of the Sids Mountain Trails. No map... B2- The road in Lower Range Creek should be reopened too within one quarter mile of the Green River instead of the now two and one half miles. This would allow a much shorter and bearable hike but yet keep vehicles far enough from the river that their not noticeable. The claim that Lower Creek is a trophy trout stream is not true and that the numerous stream crossing would destroy this is totally unfounded. During dry years there is no or little water flow to sustain any type of trophy fishery and any type of habitat that could possibility be established in wet years would unavoidably be flushed out during the major floods that routinely occur. Conflicts in the past between users were usually one sided and point to a possessive attitude of the groups floating the river. A permit would be required for motorized travel on this route. See Map B-2. B3- The area known to the Price BLM as the doughnut hole (Big Horn Mountain) is full of old roads. It has not been included in the Desolation Canyon WSA because of that very reason. Many of these roads were built in 1940s and 1950s. In the 1970s some of the routes were enlarged for oil and gas exploration. When the oil companies were finished they completely reclaimed the roads thus restricting access to whole area (they should have reclaimed the enlarged roads back to their original size). This is an open area and is being used for motorcycle riding. We are proposing that this area be kept open with some restriction. It would be a permit area and would require a fee and an authorized guide. This area would be limited to a set number of riders and seasonal closures would be set. All motorcycles riding in the area would be required to meet noise limits. The details would need to be worked out. See Map B-3. B4- The area along Hwy 6 from I-70 to Wellington which would also include Cedar Mountain has been used as a motorized recreation area for many years. Over the years a number of motorcycle races have taken place in the Chimney rock, Lost Springs, Summerville and mounds areas. There are numerous routes, most which follow old roads some that do not. All of the route should be left open until they can be designated. In fact all existing routes in the Price section of the BLM's Management area should be left open until their status is determined. No Map.	
King Crawlers (Price)	Process and Procedures	It appears that sections of the plan were left out; hopefully this was just an oversight. Whether an oversight by the authors or more concerning, a bias in its drafting, major changes are needed before this plan should be adopted... The changes the BLM is proposing in any of the alternatives are unacceptable; they amount to a wholesale movement away from current usages.	Please see general comment responses #123 and #124

Organization	Category	Comment	Response
King Crawlers (Price)	Process and Procedures	We are not totally opposed to the multiple layered approached of management (ACEC, ROS, VRM, T&E, ETC.) but the complexities of understanding how they will interact with each other might not be understood.	Please see general comment response #37
King Crawlers (Price)	Process and Procedures	Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain similar proposals. Through the use of many overlapping and confusing management "layers", the BLM will attempt to require the public to comply with these restrictions. All alternatives contained in the document represent an unprecedented change from current BLM management and until a reasonable plan is presented no changes should be made...	Please see general comment responses #2 and #37
King Crawlers (Price)	Recreation	The recreation management in the DRMP's Preferred Alternative which plans to impose group size limits and camping restrictions is totally unacceptable to us. There simply is no need for these kinds of restrictions on recreational use... G1- A number of large non-harden camp sites, able to handle big groups which already are established, should be kept in place and shown on a map. These areas would not require any permit for groups under 50 people. For group activities larger than 50 people permits would be required and a small fee but no more than a two week waiting period to obtain one. The BLM is proposing only six large group camp sites we feel that number should be increased to around 50. These camp sites already are being used, like, Buckhorn Reservoir, Lucky Flats, Chimney Rock, Mounds Area, Woodside, Clark Valley, Gordon Creek near the Wild Cat load out, Coon Spring, Tomsich Butte, etc. No Map.. B1- We are proposing a motorized recreational park be established between the old Buckmaster Mining area and Tidwell Draw, of about 3000 to 5000 acres. This area would be open to all vehicles with trails and routes designed for the different machines. This area could be used for competition events such as "Rock Crawling" for full sized vehicles and "Trials" for motorcycles and ATV's. Also non-motorized bicycle events could be held here. This would be a major undertaking and requiring cooperation from the BLM, Emery County, Utah State Parks, DOGM, Green River City, Grazing Permit holders and the User groups. This area has seen a great deal of mining activity over the years and would need some reclamation work to close old mine shafts. Green River City would receive economical benefits from such a park. The BLM has proposed this area as an ACEC for historical mining but we feel that the historical valve could be easily mitigated. A feasibility study would be appropriate including the afore mentioned groups. Funding could be pursued through a number of sources. See Map B-1.	Please see general comment response #81
King Crawlers (Price)	Wilderness	We are concerned about non Wilderness Study Area lands with or likely to have wilderness characteristic. These lands were inventoried for resources associated with wilderness character but not for other resource values. BLM is required to inventory other resource values other than those associated with wilderness character. The BLM has failed to incorporate these other resource uses and values into their inventory or their analysis in the DRMP/DEIS. The document was not clear on how the BLM would propose management of these areas but it appears like some type of defacto Wilderness Study Areas are being created.	Please see general comment responses #36 and #108
King Crawlers (Price)	Wilderness	We find these wilderness definitions vague and open to the bias of those interpreting them. Wilderness Characteristics. Features of the land associated with the concept of wilderness that may be considered in land use planning when BLM determines that those characteristics are reasonably present, of sufficient value (condition, uniqueness, relevance, importance) and need (trend, risk), and are practical to manage. Naturalness. Lands and resources exhibit a high degree of naturalness when affected primarily by the forces of nature and where the imprint of human activity is substantially unnoticeable. BLM has authority to inventory, assess, and/or monitor the attributes of the lands and resources on public lands, which, taken together, are an indication of an area's naturalness. These attributes may include the presence or absence of roads and trails, fences and other improvements; the nature and extent of landscape modifications; the presence of native vegetation communities; and the connectivity of habitats.	The concept and definition of wilderness and wilderness characteristics is codified in the 1964 Wilderness Act. As such, the glossary definition is in compliance with both IM-2003-275 as well as Utah v. Norton settlement that states "the term 'wilderness character' is used to refer to the necessary collective characteristics or features of wilderness as defined in the Wilderness Act of 1964" (footnote 1, page 2).

Organization	Category	Comment	Response
Matchbook Maps LLC	Transportation and Access	I am writing as a pilot from South East Colorado who spends many months a year in the back country of South Eastern Utah with my family and friends taking advantage of your back country airstrips. We frequent Utah on every occasion and I personally think you have one of the greatest resources for pilots in the United States. Please help keep these available for many years to come. As I like to tell people when they ask about flying and backcountry strips, "One mile of road gets you one mile. One mile of runway gets you anywhere you would like to go". It a great quote, as many people are often offended by airstrips they see from there car window. So, please help protect this resource for many generations to come.	Please see general comment response #21
MDE Engineers, Inc.	OHV Route Identification	The BLM should clearly and openly publish the effects on the Route Designation Plan. The Chimney Rock/Summerville and Humbug trail systems should remain open. The systems should be linked to the Arapeen trail system. All existing roads and trails should remain open for vehicle use.	Please see general comment responses #19, #20 and #31
MDE Engineers, Inc.	Recreation	San Rafael Swell is not a National Park and should not have group size restrictions that are arbitrary and less than the proven 50 vehicle limit.	Please see general comment response #81
Moki Mac River Expeditions, Inc.	Recreation	A requirement to switch to four stroke motors is un-needed. It is our understanding that the outboard motor industry no longer manufactures small two stroke engines. As we replace older engines, only four strokes will be available. In the mean time, a forced switch over of the complete "fleet" would present economic hardships. With normal replacement rates, most outfitters will be completely switched over within a few short years just by virtue of normal attrition of motors. Additionally, there is new outboard motor technology on the horizon, specifically Direct Fuel Injection (DFI). Developments in this line may prove to be even better than four-stroke technology as far as economy and emissions. For all their quietness and emission reduced operation, four strokes do present the hazard of spilling a crank case full of oil into the river in the case of an accident. We do not see the efficacy of banning motors except for lower water levels. We do not believe that low horsepower motor use in Desolation Canyon can be demonstrated to be harmful to the environment, regardless of what the river level happens to be at any time during the year. Low horsepower motors can be very useful in serving the public on shorter (3-day) trips which we have had the occasion in the past to run. Some groups are unable to spend five or more days on a trip. The three day trip serves a segment of the population. Additionally, motorized support rafts for a group of "funyak" or "sportyak" users is a very beneficial use. Please do not ban motors in the Desolation Canyon stretch of the Green.	Please see general comment response #34
Montana Aeronautics Division	Transportation and Access	We commend you for proposing continued use of these airstrips and fully support your preferred Alternative D contained in the management plan.	Please see general comment response #21
Montana Aeronautics Division, Department	Transportation and Access	The Montana Aeronautics Division, Department of Transportation offers the following comments relative to the Price Resource Management Plan. The Aeronautics Division supports continued use of the four airstrips in the RMA, Mexican Mountain, Hidden Splendor, Cedar Mountain and Peter's Point. We commend your for proposing continued use of these airstrips	Please see general comment response #21

Organization	Category	Comment	Response
		and fully support your preferred Alternative D contained in the management plan. The individual traveling by aircraft deserves the same access to federal lands to enjoy the recreational opportunities offered by the area as all others. These airstrips are in existence, provide a low impact method for accessing the backcountry and receive valuable volunteer maintenance from members of the Utah backcountry pilots association and others. Of extreme importance is the role these airstrips play relative to an emergency landing strip, search and rescue missions and fire management efforts. Thank you for your efforts in considering and developing management alternatives.	
Montana Pilots Association	Transportation and Access	The Montana Pilots' Association (MPA) offers the following comments relative to the Price Resource Management Plan. As President of the MPA representing 700 plus members, the MPA goes on record supporting the preferred Alternative D contained in the management plan and the continued use of the four airstrips in the RMP; Mexican Mountain, Hidden Splendor, Cedar Mountain and Sage Brush Flat/Peter's Point. These airstrips provide a low impact alternative trailhead for accessing the backcountry and play an important role as do all airstrips for emergency landing alternatives, search and rescue missions and fire management.	Please see general comment response #21
Mountain Flying Videos	Transportation and Access	Air access to airstrip trailheads on BLM land is low impact and should not be discriminated against by the BLM. There are very few airstrip trailheads as it is compared with motorized access by other user groups.	Please see general comment response #21
National Outdoor Leadership School	Recreation	We are extremely concerned that the new plan does not clarify the exact nature and scope of the Desolation Canyon SRMA and the logic governing the prescriptions attached to it. The planning process so far, does not allow one to contribute effectively to the sound design of this SRMA, as it was created outside of the planning process and it has no documented basis for the public to consult. The only elements known are those surfacing in the existing management plans for the Vernal area, since the SRMA boundaries overlap with it, and its brief discussion in the new Price draft RMP. It is unclear, therefore, how far north into Uintah County the SRMA extends, how it ties in with the special management prescriptions outlined in the old management plans for the Price and Vernal areas, or what guides the No Surface Occupancy prescriptions within it. The complete lack of cross-referencing between all those documents and the lack of documentation laying a legitimate basis for discussion of the SRMA weakens whatever input we can provide. The SRMA maps provided by the Price RMP website stop at the Carbon/Uintah county line and lack their color coding. Since the Vernal plan has been delayed, there is no way for the public to understand even what a No Action alternative would exactly entail for the SRMA future.	Please see general comment response #119
National Outdoor Leadership School	Recreation	Sandwash developed recreation site: This lack of clarification and references in the Price draft RMP feeds the existing confusion surrounding the management of the Sandwash area. While the old documents included Sandwash in the special recreation management area for Desolation Canyon, an inter-office agreement exists between the Vernal and Price field offices with heavy consequences for its preservation as a developed recreation site. Management of mineral development in the Sandwash area continues to be handled by the Vernal office while recreation components (including the permitting system and the facilities found on the site) are handled by the Price office. In the absence of sound and documented coordination between the two, it has been impossible for permit holders to engage early and in a proactive manner in the planning process for this segment of river. It is unclear what entity should be addressed when it comes to the planning process affecting Sandwash and how coordination will be ensured in the future. The new plan offers no remedy to this confusion. In this void we would like to recommend that:	Please see general comment response #119

Organization	Category	Comment	Response
		• Sandwash be clearly established as part of the Desolation Canyon SRMA. • The Desolation Canyon SRMA be better documented and co-managed by the Vernal and Price field offices (or at least clearly integrated and cross-referenced in both plans so that mineral development impacts on the recreation profile of the area can be openly discussed). • Sandwash be recognized in the new plan as an important developed recreation site and recommended for withdrawal from mineral entry and either NSO or closed to mineral leasing. • Sandwash be geographically defined as a natural feature according to the same visual management protection criteria applied for Desolation Canyon, i.e. viewshed mapping analysis, scenic vistas considerations, placement on the recreation opportunity spectrum. • A high ridge to high ridge approach be used to map out the necessary NSO stipulations within the Sandwash scenic vista.	
National Outdoor Leadership School	Recreation	Regarding the Desolation SRMA as a whole, we also support the continuation of the No Surface Occupancy for oil and gas within at least one mile of the river as prescribed in the 1979 River Management Plan, and re-proposed in the new draft. If the SRMA objectives require greater protection it should be granted, and we hope for an interim management respecting those standards until the plan is finalized.	Please see general comment response #119
National Outdoor Leadership School	Socioeconomics	Lack of socio-economic baseline data: Recreation participation, in particular through river activities, in the local counties' economy is not appropriately documented in the socio-economic analysis provided with the draft plan. Unlike statistics given in the old planning documents that made the case for the importance and role of river recreation in the local economy's employment and revenue trends, nothing in the current profile adequately translates the socio-economic impacts from recreation and tourism. Recreation falls under a broad "services" category, while the mineral development industries' statistics are carefully documented. We encourage the Price field office to provide better analysis of these important factors.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of recreation to local communities, such as Emery and Carbon counties. The DEIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities. Due to incomplete data on recreational activities, the analysis was unable to quantitative estimate changes in jobs and earnings tied to recreation in the local area. The analysis was re-edited to further evaluate these impacts and is discussed in Chapter 4, Section 4.6. Also see general comment responses #118 and #132.
National Outdoor Leadership School	Soil, Water and Riparian	Regarding all Green river sections under the Price FO jurisdiction, we support: • The withdrawal from fluid mineral leasing of all the river sections included in the Norton Withdrawal Agreement for hard-rock mining. • The use of Best Management Practices along with the layering of Visual Management criteria, ROS categories - and their respective appropriate NSO prescriptions- rather than the single credo of a fixed ½ mile or line of sight NSO corridor within the National Historical Landmark boundaries. It is not appropriate, in our view, to continue relying essentially on a management prescription that was intended to preserve a historical landmark and created for the 100th Anniversary of the Powell expedition -more than three decades ago- to answer current environmental and recreation resources concerns • The clarification of the NSO regime without its weakening: we are concerned that the plan establishes in an appendix under what circumstances each categories of NSO can be subjected to change post-leasing. It should be made clear that most changes mandate additional environmental review and public notification.	Appendix 20 addresses the issues of surface occupancy concerning wetlands, floodplains and riparian areas. These are generally protected by EPA regulations and administered by US Army Corps of Engineers through Section 404 permitting under the Clean Water Act. Further they are protected by Executive order to preserve and protect wetlands to the extent of no disturbance. BLM also has policies to protect these vital and precious lands from disturbance. The Utah BLM does not have the authority to change laws, executive orders and national policy. Under all alternatives, most lands along the Green River

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			would be closed to leasing. The areas not closed would be NSO. These restrictions cover a much larger area than the withdrawal from hard rock mining. VRM and classifications overlay the entire river corridor under all alternatives. The Desolation Canyon NHL is 1 mile, not 1/2 mile from the river.
National Outdoor Leadership School	Transportation and Access	The sound management of the Nine Mile Canyon access road and the developed Sandwash area are essential to the recreation experience in Desolation Canyon. They provide the only road access and easy water entry directly before the canyon.	The existing Desolation and Gray Canyons of the Green River Management Plan would continue to be used as the activity plan for the Desolation Canyon SRMA. Extensive land use restrictions were proposed in the Draft RMP/EIS for the Desolation Canyon SRMA. Thus, recreation use would be aggressively managed to meet the goals and objectives of these areas.
National Outdoor Leadership School	Wild and Scenic Rivers	The range of alternatives provided in the draft is not adequate. The preferred alternative does not reflect accurately the results of past BLM potential eligibility studies and we urge the BLM not to downgrade the suitability of river segments, disregarding the actual level of development of the areas they are part of and the outstanding values they offer, the only valid criteria. We do not understand how some segments of river, i.e. Desolation Canyon, were found eligible for 'wild' status and are deemed suitable for 'scenic' status only in the preferred alternative. Our understanding of the process is that a segment is ultimately found by Congress suitable or not for inclusion in the National System at the level of protection is was found eligible for, not less.	Please see general comment response #148
National Trust for Historic Preservation	ACEC	The Draft RMP also states that "[s]ome cultural resource sites and areas need special management but are not designated ACECs in [the preferred alternative]. These sites/areas may not be preserved. Many of these areas have public use values that may not be preserved." Draft RMP at 4-519. BLM provides no discussion as to why these areas would not be, or could not be, preserved, and instead other values are given priority over preservation.	Please see general comment response #158
National Trust for Historic Preservation	ACEC	B. Failure to Provide Appropriate Management Objectives for Current and Proposed ACECs In Accordance with FLPMA: ACECs should not be strictly subject to multiple-use principles. FLPMA requires BLM to ensure that public lands prioritize ACECs on an on-going basis. 43 U.S.C. § 1711(a). According to FLPMA, BLM must "give priority to the designation and protection of [ACECs]" in developing and revising land use plans. Id. § 1712(c)(3) (emphasis added); 43 C.F.R. § 1610.7-2. ACECs are defined as "areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values. . . ." Id. § 1702(a) (emphasis added); see also BLM, Land Use Planning Handbook, H-1601-1 at Appendix C, page 17. The protective standard for ACECs is even greater than the non-impairment provision of Section 1702(c) or the prevention of unnecessary or undue degradation standard of Section 1732(b) of FLPMA. Therefore, in accordance with FLPMA, BLM must not only identify and give priority to ACECs, but must also manage identified ACECs with greater protection than other areas.	Please see general comment response #30

Organization	Category	Comment	Response
National Trust for Historic Preservation	ACEC	1. Nine Mile Canyon Proposed ACEC: The preferred alternative does not provide appropriate management objectives that will protect and prevent irreparable damage to the significant resources in Nine Mile Canyon. For instance, the preferred alternative provides that Oil and gas leasing would be open to leasing subject to major constraints (no surface occupancy) the ACEC, and within the canyon rims). [Sic] Areas that do not meet both of these criteria will be open to leasing with minor constraints (timing limitations, controlled surface use, lease notices) as indicated on Map 2-31. Draft RMP at 4-508. Notwithstanding the confusing wording of the above statement, it appears that lands that are generally within the ACEC and not within the canyon rims require only minor constraints. Additionally, the preferred alternative indicates that "oil and gas development would be limited to surface disturbance on non-BLM lands only within canyon rims." Id. While these statements seem inconsistent, the National Trust is concerned that there are numerous rock structures along the canyon rims that may be adversely affected by oil and gas development, including granaries and habitation structures. Therefore, the National Trust recommends that canyon rims should be excluded from oil and gas development. Oil and gas development should be limited to the plateau above the canyons. The canyon bottoms in Nine Mile Canyon were also areas of significant human habitation. BLM should withdraw the entire canyon bottom from any oil and gas development. The preferred alternative establishes an inadequate buffer zone of a 100-foot setback for oil and gas development from "inventoried" cultural resources. Id. at 4-510. The preferred alternative also provides for an exemption from these requirements if "appropriate mitigation" could be accomplished. Id. The preferred alternative also commits the Nine Mile Canyon ACEC to the lesser Visual Resource Management Class III, instead of setting a higher visual resource standard. Id. at 4-509. All of these factors would make the ACEC designation of Nine Mile Canyon virtually meaningless. BLM has set an inappropriately low bar for seeking to prevent the degradation of the Nine Mile Canyon areas cultural resources. Indeed, the protective standards proposed by the preferred alternative fail to achieve the ACECs categorical purpose as provided by Congress in FLPMA, and therefore, BLM should amend Draft RMP to add appropriate management objectives for the Nine Mile Canyon ACEC.	Please see general comment response #154
National Trust for Historic Preservation	ACEC	2. Failure to Designate Identified Potential ACECs in the Preferred Alternative: The following proposed ACECs were excluded by BLM in the preferred alternative, despite having significant cultural resource relevance and importance. BLM provides no analysis to support this decision. In fact, there is no discussion about what information, i.e. cultural resource surveys, etc., BLM considered in excluding these ACECs: • Proposed Lower Green River ACEC, 43,428 acres eligible (Draft RMP at 4-504 &Appendix 26); • Proposed Temple-Cottonwood Dugout Wash ACEC, 80,818 acres eligible (Draft RMP at 4-506-07 & Appendix 26); • Proposed Gordon Creek ACEC, encompassing 4,099 acres. Draft RMP at 4-513 & Appendix 26. Incidentally, the Draft RMP identifies Gordon Creek as "a distinct archaeological resource. Two agricultural communities occupied the area: the Fremont cultural about 1,000 years ago and historic pioneers about 100 years ago. Although this	Please see general comment response #158

Organization	Category	Comment	Response
		situation existed elsewhere, early abandonment and natural closure of the area have left sites relatively undisturbed and provide an opportunity to study the similarity and differences of the two cultural responses to the same area." Id. (emphasis added). BLM should seek to include these proposed ACECs. In the alternative, if BLM excludes these ACECs, BLM should provide a reasoned analysis supporting the exclusion.	
National Trust for Historic Preservation	ACEC	3. Other ACEC Issues and Concerns: BLM fails to justify the "limited" OHV designations for some of the current and proposed ACECs. The alternatives allow for "limited" OHV use within the proposed ACECs without any analysis or discussion about the potential impacts OHV use will have on each ACECs' cultural resources. See 4-530 – 535. BLM changes the management prescriptions for current ACECs without providing any analysis or support for such a decision. For Pictographs ACEC, BLM changes oil and gas leasing designation from "closed" to "open" with NSO stipulations. Draft RMP at 4-496. BLM makes the same changes for Copper Globe ACEC. Id. at 4-491, 4-514. What is the justification for such changes? Have the potential consequences to the cultural resources within these ACECs and others with similar changes been adequately examined?	Please see general comment response #152
National Trust for Historic Preservation	ACEC	Furthermore, it is important to note that the Draft RMP does not discuss the Nine Mile Canyon Special Recreation and Cultural Management Plan as part of the future management of the area. As we understand it through discussions and meetings with BLM, BLM relies heavily on this plan to highlight its commitment to cultural resources. Therefore, its absence in this discussion is particularly troubling. See Draft RMP at 4-508. This information must be a significant part of the discussion for how BLM intends to manage the Nine Mile Canyon ACEC in a way that protects and prevents irreparable damage to the vast cultural resource	Under the Proposed RMP, the portions of the canyon where public lands are more consolidated and existing disturbances are small would be managed as VRM II and other areas would be managed as VRM III. This management would allow the 1995 Recreation and Cultural Area Management Plan to continue to be implemented as noted on page 35 of that document, which directs that management of activities on public lands "meet or exceed VRM II/III guidelines, as appropriate." The Proposed RMP would retain implementation of the 1995 Recreation and Cultural Area Management Plan, as referenced on Draft RMP/EIS page 2-81 and in Table 2-15 of the Proposed RMP/Final EIS.
National Trust for Historic Preservation	Cultural Resources	I. NATIONAL HISTORIC PRESERVATION ACT VIOLATIONS AND CONCERNS: Congress recognized that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development," and that "the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, esthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans." 16 U.S.C. § 470(b)(2), (4). To accomplish this goal, Congress directed Federal agencies to implement affirmative stewardship responsibilities – to manage and maintain their cultural resources in a way that considers the preservation of their historic, archaeological, and cultural values – as well as procedural responsibilities – to take into account the effects of their actions on historic properties. However, the Draft RMP fails to incorporate BLM's responsibilities under the NHPA into the RMP process, and fails to ensure that irreplaceable historic and cultural resources are fully considered in management decisions. BLM focuses too	The alternatives analyzed provide appropriate protection and/or use of the various resources in the planning area. BLM complies with all laws, policy and regulation when making land use plan decisions. These laws, regulations or policies neither require all cultural resources to be preserved in place nor that all effects to cultural resources be mitigated on a site by site basis. In response to concerns of oil and gas leasing impacts to cultural resources, BLM Instruction

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		heavily on accommodating consumptive uses that likely conflict with preservation, which tends to overshadow the goals of the NHPA. For example, BLM's preferred alternative proposes to "open" 2 million acres for oil and gas leasing, despite having surveyed less than 5 percent of the 2.5 million acres for which the Price Field Office is responsible. Such an effort to offer 80 percent of the PFO for one use without fully considering whether sensitive resources may not be compatible with energy development does not represent either the analysis required by FLPMA and NEPA, or the preservation mandate promoted by Congress in the NHPA. BLM's broad management objectives in the Draft RMP reflect an erroneous assumption that the preservation of irreplaceable cultural and historic resources can occur later in time, i.e., after BLM has committed areas to particular uses. In planning for the entire PFO, it is imperative that BLM view entire area from a holistic perspective rather than through piecemeal projects and narrow boundaries. Nine Mile Canyon, for example, could have been managed and protected much more effectively for its value as a cultural landscape had there been appropriate management objectives prior to the issuance of the many oil and gas leases in the area. It seems paramount to BLM's stewardship responsibilities under the NHPA that BLM consider the larger context of cultural resources, prior to moving forward with irreversible management decisions that could harm or destroy them, while foreclosing alternatives for preservation and protection.	Memorandum No. 2005-003 states "Allocation decisions for oil and gas do not grant any rights or authorize any activities." The Price Field Office complies with the requirements of Section 106 of the NHPA for implementation decisions in the RMPs, including those associated with oil and gas, in accordance with the BLM State protocols under the BLM national Programmatic Agreement. The RMP is the stage at which decisions are made concerning which areas are open or closed to leasing and what stipulations would be applied at lease issuance. While the purchaser of a lease is entitled to develop a parcel consistent with lease stipulations, an approved Application for Permit to Drill (APD), including a plan of operations, must be completed before ground disturbing activities can begin. BLM requires inventory of all sites for cultural resources prior to authorization of surface disturbing activities. It is BLM policy to first avoid cultural properties identified in these inventories.
National Trust for Historic Preservation	Cultural Resources	A. The Trust Opposes BLM's Recommendation to Allow Unilateral Waiver of Survey and Identification Requirements Under Section 106: In the "Actions Common to All Alternatives" section of the Draft RMP, BLM acknowledges that a cultural resource inventory would be required for most land use actions., but the RMP provides that a field manager could unilaterally waive the inventory for any part of an area of potential effect" under certain circumstances, such as ground disturbance or the existence of prior surveys. 1 BLM consistently argues that many of the leases in the Nine Mile Canyon area were issued in the 1950s, and therefore there is nothing the agency can do to prevent development. Yet, in the Draft RMP, BLM advances a similar proposal to lease as much as possible today, without thinking about the consequences in the future. This failure to consider cumulative impacts is one of the fundamental legal flaws with BLM's approach. Draft RMP at 2-10, 2-34, 4-93. However, the circumstances under which BLM proposes to exercise a unilateral waiver of its responsibility to identify historic properties are all circumstances that relate only to archaeological resources whose potential significance would be limited to eligibility criterion "d" (research and information value) for the National Register of Historic Places, 36 C.F.R. § 60.4(d). The proposed unilateral discretion to waive surveys would not take into account the potential for effects to historic resources of traditional religious and cultural value to Indian tribes, as required under 16 U.S.C. § 470a(d)(6). BLM lacks the authority to unilaterally waive an inventory under Section 106 merely because it believes that there are no cultural resources. See, e.g., Attakai v. United States, 746 F. Supp. 1395, 1405-08 (D. Az. 1990). Even BLM's Nationwide Programmatic Agreement (PA) and the Utah Protocol implementing the PA do not authorize this procedure. In accordance with current regulations, BLM must consult with the State Historic Preservation Officer (SHPO) and Indian tribes prior to	The BLM Manual procedures are the foundation to both the national Programmatic Agreement (nPA) and the Utah Protocol. The Manual is a comprehensive document which was accepted by the Advisory Council on Historic Preservation (ACHP) and the National Conference of State Historic Preservation Officers (NCSHPO) as being consistent with statute and regulations. The nPA specifically incorporates the BLM Manual as guidance to BLM Field Offices in lieu of the implementing regulations; the Utah Protocol is tiered directly from the nPA. Inventory waivers may be applied only under limited circumstances as set forth in the BLM Manual, and pertain only to the conduct of pedestrian inventory for a particular proposed undertaking. Waivers are only employed when there is defensible information to allow a professional judgment that physical traces of cultural resources will not be present. BLM provides an opportunity for tribes to consult

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		making such decisions. 36 C.F.R. §§ 800.2(c)(1), 800.2(c)(2). It is particularly important to consult with tribes, since traditional cultural properties (TCPs) are not always tangible and visible to non-natives. 16 U.S.C. § 101(d)(6)(B); 36 C.F.R. §800.2(c)(2)(ii)(A). As currently proposed, this proposed procedure violates the NHPA. BLM must remove or amend the proposed procedure to reflect the consultation requirements of the NHPA and current ACHP regulations.	with BLM to resolve any tribal concerns, including the identification, evaluation, and treatment of properties with traditional religious and cultural values. There is no inherent relationship between physical inventory to locate historic and archaeological resources, and the process of working with tribes to identify properties that have traditional religious and cultural value. Only tribes can identify these traditionally important places; archaeologists looking for physical traces of the past cannot identify such properties.
National Trust for Historic Preservation	Cultural Resources	B. BLM Must Identify, Examine, and Protect Traditional Cultural Properties Significant to Indian Tribes in Accordance with the NHPA Early in the Planning Process: The Draft RMP fails to identify, examine, and protect Traditional Cultural Properties (TCPs) significant to Indian Tribes in accordance with the NHPA, and BLM policies and procedures. Under Section 101(d)(6) of the NHPA, Federal agencies are required to consult with Indian tribes regarding the existence of properties with "religious and cultural significance." 16U.S.C. § 470a(d)(6). According to BLMs policies and procedures, "[l]and use planning and environmental review shall be the principal procedural systems for giving Native American cultural and religious issues due consideration, including the opportunity for direct input from those affected." BLM Manual 8160.08.A.1 (emphasis added). 2 Further, BLM's Land Use Planning Handbook directs BLM to consult with Tribes regarding TCPs, and to comply with the American Indian Religious Freedom Act (AIRFA) (requiring BLM to protect and preserve access to religious and traditional sites), and Executive Order 13007 (requiring BLM to accommodate access to and use of sacred sites and also to avoid adversely affecting the physical integrity of sacred sites). 2 BLM Manual 8160, addressing Native American Consultation, is grossly outdated. It was released on January 26, 1990. In the 15 years since the Manual's release, Congress has amended the NHPA to incorporate substantially stronger requirements for tribal consultation by federal agencies, and the ACHP has amended the Section 106 regulations to reflect Congress' 1992 NHPA amendments. BLM, Land Use Planning Handbook, H-1601-1, at III-10. Recognizing NHPA authority, BLM's handbook on tribal consultation points out that "[t]he key to making its [land use planning and environmental review] systems work as they should for Native Americans is to bring particular groups, cultural interests and concerns into the planning and environmental review process from the very outset." BLM, H-8160-1 B., General Procedural Guidance for Native American Consultation, I.F. (released 11/03/94) (emphasis added). The Handbook describes why early consultation is necessary "to assure that tribal governments, Native American communities, and individuals whose interests might be affected have a sufficient opportunity for productive participation in BLM planning and resource management decision making." Id. at I.A. The Handbook further recognizes that conventional NHPA and NEPA analyses "generally do not appropriately address the consequences felt by Native American practitioners." Id. at II.D. BLM sent initial letters to 37 tribes regarding the RMP and received 11 letters in response, many requesting consultation meetings. Additionally, it appears that BLM has met with some tribes, including the Ute, Hopi, and	BLM has made an extensive effort to consult with Native American Tribes that may have ties to the Price planning area. BLM began during scoping to identify concerns of Native Americans. Meetings were held and the draft RMP/EIS was released to the public and sent to Native American Tribes. Follow-up visits have been made to tribes requesting them. Consultation will continue throughout the process. Chapter 5 of the final EIS has been updated reflecting all consultation.

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		Paiute. Draft RMP at 5-1 to 5-2. While this is a good preliminary step in initiating consultation, BLM indicated that it would not initiate formal consultation with interested tribes until after publication of this Draft RMP. Id. at 5-2. As stated above, formal consultation should begin at the earliest possible time in order to incorporate concerns into the land use process. Initiating formal consultation after the Draft RMP has already been sent out for comments may not provide BLM or the Tribes sufficient time to address concerns that may arise. In order to adequately address TCPs, and other cultural and historic resources, especially those relating to Native American traditions, BLM should conduct a more thorough tribal consultation process and issue a Supplemental Draft RMP/EIS for public comment before developing the Proposed RMP. We understand that tribal consultation may require an investment of time in building relationships and trust, but it is imperative that Native American traditional cultural resources are considered in depth prior to making decisions that designate lands for specific future uses such as oil and gas drilling, which could adversely affect the values of those resources. Failure to conduct adequate and timely consultation jeopardizes irreplaceable cultural and historic places.	
National Trust for Historic Preservation	Cultural Resources	C. BLM Must Comply with Section 106 of the NHPA Prior to the Designation of Off-Highway Vehicle (OHV) Routes. We strongly urge BLM to conduct a Section 106 review of areas designated for OHV use, "prior to" approving the RMP. 16 U.S.C. § 470f. Generally, the RMP establishes a written document of land use limitations, resource condition goals and objectives, support actions, and a number of other items. See 43 C.F.R. § 1601.0-5(k). The RMP "is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and regulations." Id. However, when an RMP designates areas for transportation access and travel, as is the case here, that decision should be considered an "undertaking" requiring compliance with Section 106, because adoption of the RMP is the final agency action that authorizes activities with potential adverse effects on historic properties. In contrast to other types of activities, which may require subsequent approval from BLM, the designation of OHV routes constitutes final authorization for the harmful activities. In this case, we believe that the designation of roads constitutes an undertaking, thus triggering Section 106 review prior to BLM's approval. We are particularly concerned about OHV use, because it has the serious potential to adversely affect cultural and historic resources. BLM admits that [i]mpacts from OHV use would continue on approximately 2,076,000 acres limited to designated routes. This includes surface disturbance from route widening, route braiding, and route pioneering. Use on existing routes would result in amplified erosion impacts. The potential for impacts to cultural resources from this erosion and surface disturbance would continue in the areas limited to designated routes. Draft RMP at 4-378 (emphasis added). Despite the "potential" to impact cultural resources, BLM has failed to review these effects under Section 106. Nor has BLM evaluated the specific environmental consequences to cultural resources caused by the proposed official designation of roads for this use. Given that less than 5 percent of the entire area has been inventoried for cultural resources, opening 2,076,000 acres to OHV use, as the preferred alternative proposes, could have continued, devastating impacts on cultural resources. Therefore, it is critical that BLM comply with the requirements of Section 106 prior to	The route designation process is an undertaking subject to Section 106. BLM has provided the State Historic Preservation Office (SHPO) an opportunity to review and comment on all phases of the RMP beginning with the initial scoping phase. The Section 106 process will be completed in consultation with SHPO and others as appropriate, prior to issuance of a final decision. There will be no areas open to cross-country travel. This decision will provide additional protection for cultural resources. See Chapter 4, Cultural section.

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		determining which areas should be "opened," "closed," or "limited" to OHV use. Additionally, BLM should provide for specific management directions and goals to control potential adverse effects to cultural resources, e.g., appropriate signage, barriers, etc.	
National Trust for Historic Preservation	Cultural Resources	D. The Draft RMP Does Not Adequately Consider How BLM Will Carry Out Its Section 106 Responsibilities for the Issuance of Oil and Gas Leases: he Draft RMP should provide an appropriate timeline for complying with Section 106 in the context of oil and gas leases. Issuing oil and gas leases is not only an "undertaking" triggering Section 106, but it is an activity considered to have "adverse effects" in accordance with the Section 106 regulations. See Montana Wilderness Association v. Fry, 310 F. Supp. 2d 1127, 1152 (D. Mont. 2004); Southern Utah Wilderness Alliance, 164 IBLA 1, 27-28 (Nov. 10, 2004). The court held in Montana Wilderness Association that BLM cannot defer compliance with Section 106 until the APD stage by simply adding stipulations to a lease. Id. ("[BLM] cannot skip the first step and go directly to the second. If the lease sales are an undertaking, BLM is required to initiate the NHPA process in accordance with the regulations"). In short, BLM must complete the Section 106 process prior to issuing leases, including consulting with interested Tribes and other members of the public to identify traditional cultural properties and other historic resources. Prior compliance with Section 106 is especially critical in this case, because the preferred alternative proposes to "open" for oil and gas leasing over 2 million acres out of the 2.5 million acres addressed in the RMP. Draft RMP at 2-99. Even if the adequacy of BLM's analysis regarding the potential environmental consequences associated with "opening" these areas were enough to satisfy NEPA, which we contend below that it is not, it cannot be substituted for compliance with Section 106. See Montana Wilderness Association, 310 F. Supp. 2d 1152; Southern Utah Wilderness Alliance, 164 IBLA at 28-31. As an alternative to completing Section 106 during the RMP stage, BLM could consider using a phased process for Section 106 compliance for oil and gas leasing. The Section 106 regulations allow agencies to use a phased process for identifying and evaluating adverse effects to cultural resources when the nature of the undertaking and its potential scope and effect have not yet been completely defined. 36 C.F.R. § 800.4(b)(2). Phased identification permits the deferral of final identification and evaluation of historic and cultural resources until such time as the project is more refined, i.e., at the leasing and/or application for permit to drill phase. Id. However, a phased approach requires that a Memorandum of Agreement (MOA) or a Programmatic Agreement (PA) be in place prior to proceeding. Id. The MOA or PA must be negotiated in consultation with the SHPO and interested Indian tribes. 36 C.F.R. §§ 800.4(b)(2), 800.6(b), 800.14(b). An MOA or PA for a phased approach to Section 106 review could work well for the Price RMP, because it would facilitate a more streamlined approach to Section 106 compliance, especially in the area of oil and gas development, when the actual scope of development is still uncertain at the planning phase. Id. § 800.14(b). OHV recreation activities could also be included in the PA. We recommend that, in consultation with the SHPO, tribes, and other consulting parties, a PA be negotiated and implemented prior to the issuance of the Final RMP/EIS.	In this RMP the BLM responds to the National Historic Preservation Act of 1966. The Utah State Historic Preservation Officer has been included in the preparation of this plan from the beginning and the Section 106 process will be completed before BLM's final decision. Furthermore, this RMP does not issue any oil and gas leases. The RMP is the stage at which decisions are made concerning which areas are open or closed to leasing and what stipulations would be applied at lease issuance. BLM Instruction Memorandum No. 2005-003 states "Allocation decisions for oil and gas do not grant any rights or authorize any activities." As such, forecasted impacts to cultural resources from oil and gas development were based on a reasonably foreseeable oil and gas development scenario.
National Trust for Historic Preservation	Cultural Resources	E. BLM Must Take a Proactive Stewardship Role in Managing Cultural Resources on Public Lands. 1. BLM Fails to Integrate Compliance With Section 110 of the NHPA into the RMP Process.	BLM has incorporated management actions which are responsive to Section 110 of the National Historic Preservation Act (NHPA) into agency

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		BLMs stewardship role under the NHPA is not one that begins only at the implementation stage, that is, once cultural resources are threatened by site-specific activities, but rather, BLMs stewardship role should be a continuing one, which provides guidance throughout the planning process. According to Section 110 of the NHPA, BLM is required to identify, evaluate, and nominate historic properties to the National Register, as well as assume responsibilities for preserving historic properties. 16 U.S.C. § 470h-2(a). See also Executive Orders 13007 and 13287. Unfortunately, BLM has made no effort to inventory resources as part of the RMP process in compliance with NHPA and FLPMA. BLM must make a better effort to inventory what historic and cultural resources are at risk during the RMP process. The Price Field Office includes 2.5 million acres of surface estate and 2.8 million acres of federal mineral resources underlying lands managed by BLM, the U.S. Forest Service, the State of Utah, and private entities. Draft RMP at ES-1. Less than 5 percent of this large planning area has been inventoried for cultural resources, yet BLM has designated an overwhelming majority of the area as "open" for energy or mineral development, including areas within proposed Areas of Critical Environmental Concern (ACECs). Id. at 3-19 and Map 2-31. Existing BLM inventories have identified over 2,000 sites, and it is estimated that there are tens of thousands of yet-undiscovered sites throughout the region. Id. Designating an area for specific uses, especially those likely to adversely affect cultural resources, without understanding what cultural and historic resources are at risk, is contrary to BLM's stewardship role under Section 110. This is especially troubling given that BLM considers the Price area to be the "center of the Freemont culture, and its abundant cultural resources show human presence in the area over the past 12,000 years." Id. The Price Field Office has agreed to inventory certain areas with special cultural designation -- ACECs, Research Natural Areas (RNAs), National Historic Landmarks (NHLs), sites eligible for the National Register, cultural resource sites identified for public use, areas within a five-mile radius of cities or towns, and 400 feet from the centerline of designated OHV trails. Id. at 2-35. While it is commendable that BLM is taking the initiative to inventory certain areas, it is unclear how BLM came to the decision as to which areas should be made available for leasing, when less than 5 percent of the area has been surveyed. Additionally, throughout the draft RMP, BLM recognizes that surface disturbing and disruptive activities could damage, degrade, or destroy cultural resources. See, e.g. Draft RMP at 4-378, 4-438 to 4-441. However, BLM provides little or no analysis as to why these potential losses are acceptable when weighed against the destructive uses. BLM should integrate its Section 110 stewardship responsibilities within the draft RMP at the same time that BLM is proposing activities that are potentially damaging to these resources. Making determinations about future acceptable uses, according to FLPMA=s multiple-use principles, is arguably the most appropriate point at which BLM can truly seek to identify, evaluate, and nominate historic properties to the National Register in a proactive manner. We strongly encourage BLM to address its Section 110 responsibilities during the RMP process, in order to allow BLM to balance cultural resource preservation with other uses.	operations. Measures in the RMP/EIS meet the spirit and intent of Section 110. As a matter of policy, BLM integrates existing Class I and Class III inventory data for use and consideration in the land use planning process. BLM has identified priority areas for pro-active inventory in the RMP. Further, site specific analysis and inventory is required prior to project implementation. BLM has met the requirements of Executive Order 13287. BLM is in compliance with NHPA, and will meet all requirements of Section 106 of the NHPA prior to making land use plan decisions. BLM is protecting cultural and historic properties through the designation of ACECs (see Chapter 2, ACEC section).
National Trust for Historic Preservation	Cultural Resources	A. The Draft Price RMP/EIS Provides Insufficient Baseline Data and Discussion of the Affected Environment.	Chapter 3 of the Proposed RMP/Final EIS includes additional Cultural resource information. BLM used

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		BLM fails to provide adequate baseline data, information, and a description about current cultural and historic resource conditions in the Draft EIS, including the current adverse impacts of energy development and other conflicting uses on cultural and historic resources. BLM is required to "describe the environment of the area(s) to be affected or created by the alternatives under consideration." 40 C.F.R. § 1502.15. Establishing baseline conditions of the affected environment is an essential requirement of the NEPA process. See Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988) ("without establishing . . .baseline conditions . . . , there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA"). The NEPA process mandates a "coherent and comprehensive up-front environmental analysis to ensure informed decision making to the end that 'the agency will not act on incomplete information, only to regret its decision after it is too late to correct." Marsh v. Oregon Natural Resources Council, 490 U.S. at 371. The Price Field Office, like other BLM offices, suffers from a long-term failure to inventory and identify the cultural and historic resources under its management. Yet more than 2,000 sites have been identified within the Price Field Office, even though less than 5 percent of the area has been inventoried. Draft RMP at 3-19. Additional cultural resources are likely to be abundant and significant to our national heritage. As the Draft RMP states, "[t]he information that could be gained from cultural resources in the PFO is not available elsewhere. Opportunities for archeological research in the PFO are believed to be nearly unlimited." Id. (emphasis added). Many of the cultural resources are increasingly at risk of being damaged, destroyed, and lost forever. Id. Nevertheless, BLM has not identified known cultural resources within current and proposed energy development areas, or known resources that are in or near areas that have been leased and will likely be developed. How can the agency, much less the public, comprehend and comment on what resources will be sacrificed by BLM's management decisions without this information?	the best data available for the land use planning scale (landscape rather than site-specific) level of decision-making. Most decisions made in this RMP are programmatic in nature and do not effect a known specific area or number of acres. Since the anticipated disturbances and their potential locations are not definite, and the available cultural resource data is in a format that constrains its use in a programmatic, landscape level impact analysis, a specific accounting of the number of cultural sites that would be impacted would not possible even if all sites were inventoried.
National Trust for Historic Preservation	Cultural Resources	More specifically, the draft RMP does not indicate how many acres within the planning area are already "open" for oil and gas leasing. See Draft RMP at Appendix 21 (discusses how many wells have been drilled over the last 13 years, Appendix 21 at 2-3, but does not provide information on the current leasing status). A comparison between present development and future development should be provided, as well as information about how each alternative for areas "opened" to leasing and areas that are already leased but not developed, match up with both identified cultural resource sites and landscapes. Without this necessary baseline information, BLM's environmental analysis of potential cultural resource impacts from proposed actions is fatally flawed.	Acres currently "open" for oil and gas leasing are shown on page 2-99 of the Draft RMP/EIS. Page 3-52, Table 3-31 shows acreage currently under lease. Acreage of future leases cannot be determined, however, a reasonably foreseeable oil and gas development scenario was utilized in projecting the number of acres that would be disturbed from oil and gas development.
National Trust for Historic Preservation	Cultural Resources	B. The Draft RMP Does Not Adequately Evaluate the Environmental Consequences of Energy Development and OHV Designations on Cultural and Historic Resources. 1. The Draft RMP/EIS Provides Insufficient Analysis of Direct and Indirect Effects on Cultural and Historic Resources. The analysis within the Draft RMP/EIS for direct and indirect impacts to cultural resources is inadequate. An EIS must analyze not only the direct impacts of a proposed action, but also the indirect impacts of past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Custer County Action Assoc. v. Garvey, 256 F.3d 1024, 1035 (10th Cir. 2001); 40 C.F.R. §	Regardless of the acres open for oil and gas leasing, BLM forecasts oil and gas exploration and development will disturb a subset of those acres. The impact analysis accounts for this, as well as the mitigative effect of cultural resource inventories and mitigation requirements. As the actual placement of each oil and gas well or associated ancillary feature is unknown at this level of

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		1502.16(a), (b). The NEPA regulations define indirect impacts as those "caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable . . . ." 40 C.F.R. § 1508.8(b). The Draft RMP proposes to "open" for leasing 1,757,811 acres, with only standard stipulations or minor constraints. Draft RMP at 4-435. This could put an incredible amount of oil and gas leasing pressure on the agency, and also jeopardize the protection of cultural resources. In addition, providing leases to private individuals could create property rights expectancies that could foreclose or limit BLM's ability to protect cultural resources from damage in the future. Despite these management decisions and the Draft RMP's future commitment to heavy energy development, BLM provides very little information on direct and indirect impacts, especially for the preferred alternative analysis. In fact, the Draft RMP inappropriately limits a general discussion of direct and indirect impacts of oil and gas leasing to the potential for surface disturbance. As BLM explains, "development of roads, drill pads, pipelines, and ancillary facilities construction would create an initial disturbance of approximately 579 acres per year." Draft RMP at 4-442; see also at 4-437, 4-448 B 4-449 & Appendix 21. This translates to a total of 11,576 acres for the period covered by the RMP. Id. While this description addresses generalized impacts that are expected, the EIS violates NEPA by failing to assess or quantify the magnitude, intensity, or significance of the direct and indirect impacts. 40 C.F.R. §1502.16(a),(b) (the EIS must discuss direct and indirect effects "and their significance"); Neighbors of Cuddy Mountain v. US Forest Service, 137 F.3d 1372, 1380 (9th Cir. 1998) ("General statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided."). In addition, the Draft RMP is misleading about whether direct or indirect impacts in the preferred alternative will occur at all. First, the Draft RMP states that there will be "no impacts to cultural resources from oil and gas development on over 701,900 acres (28 percent) of the PFO," because 149,306 acres have No Surface Occupancy (NSO) stipulations, and 583,128 acres are "closed" to leasing. Draft RMP at 4-435. Even with NSO stipulations, ancillary activities connected with energy development could have direct or indirect effects on cultural resources and landscapes, for example, increased road activity through NSO areas or rights-of-way for pipelines. Second, the Draft RMP's conclusion that "[c]ultural resource values on the remaining 1,789,400 acres (72 percent) of the PFO would be preserved from damage from surface disturbance related to oil and gas development through mitigation methods such as avoidance and data recovery" is not only misleading, but is a conclusion that is "arbitrary and capricious," lacking any evidentiary support. Draft RMP at 4-439. BLM cannot assume that it can mitigate all potential adverse effects in the future, nor can it defer any detailed analysis of impacts to cultural resources for subsequent NEPA or NHPA processes associated with site-specific development. Federal courts have unambiguously rejected such arguments: An agency may not avoid an obligation to analyze in an EIS, environmental consequences that foreseeably arise from an RMP merely by saying that the consequences are unclear or will be analyzed later when an EA is prepared for a site-specific program proposed pursuant to the RMP. '[T]he purpose of an [EIS] is to evaluate the possibilities in light of current and contemplated plans and to produce an informed estimate of the environmental consequences. . . . Drafting an [EIS] necessarily involves some degree of forecasting . . . .' NEPA is not designed to postpone analysis of an environmental consequence to the last possible moment. Rather, it is designed to require such analysis as soon as it can reasonably be done. Kern v. U.S. Bureau of Land Management, 284 F.3d 1062, 1072	planning, a comparative analysis between alternatives as to the potential to affect cultural resource sites was completed. Alternatives were analyzed based on their potential to have a greater or lesser likelihood of impacting cultural resource sites through the actions noted in the plan, given cultural resource mitigation is implemented. Designating an area as no surface occupancy includes the construction of roads, pipelines, and other ancillary features associated with oil and gas development on leases in that given area. The analysis correctly adds the phrase "...by oil and gas development..." when discussing these impacts. While ROWs not associated with the lease could be proposed, impacts from that type of action would be addressed in this EIS as a discretionary Lands and Realty action and impacts from such actions are noted in other portions of this analysis.

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		(9th Cir. 2002) (quoting City of Davis v. Coleman, 521 F.2d 661, 676 (9th Cir. 1975)) (emphasis added); see also Save Our Ecosystems v. Clark, 747 F.2d 1240, 1246 n.9 (9th Cir. 1984) ("Reasonable forecasting and speculation is . . . implicit in NEPA, and we must reject any attempt by agencies to shirk their responsibilities under NEPA by labeling any and all discussion of future environmental effects as 'crystal ball inquiry.'"). Because it is not only "reasonably possible" to analyze the environmental impacts of the proposed energy development on cultural resources, but also likely that such impacts will occur, BLM should be required to analyze those impacts in the EIS and provide such information to the public. See Kern, 284 F.3d at 1072.	
National Trust for Historic Preservation	Cultural Resources	Similarly, as discussed under the NHPA, the draft RMP is lacking in its analysis about how increased OHV designations and other forms of recreation will directly and indirectly impact cultural resources. The preferred alternative does limit the number of roads and trails designated as "open" for OHV use. See Draft RMP at 4-376, Map 2-16, Map 2-56. However, the Draft RMP makes no attempt to analyze the impacts to cultural resources, despite stating that the "potential for impacts to cultural resources from . . . erosion and surface disturbance would continue on the areas limited to designated routes." Id. at 4-378. Furthermore, there is no analysis regarding current impacts to cultural resources caused by OHV use.	Impact analyses were revised to reflect changes in the alternatives and to improve the clarity and readability of the document. See general comment response #123.
National Trust for Historic Preservation	Cultural Resources	2. Insufficient Analysis of Cumulative Effects on Cultural and Historic Resources: According to NEPA, BLM has an obligation to take a "hard look" at the potential environmental consequences of cumulative impacts. 40 C.F.R. § 1508.25(c)(3); see also Neighbors of Cuddy Mountain, 137 F.2d at 1379 (Forest Service must "consider cumulative impacts"). Cumulative impacts are the compounding of an action on "other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions." 40 C.F.R. § 1508.7 (emphasis added). These impacts "can result from individually minor but collectively significant actions taking place over a period of time." Id. The Tenth Circuit has "expressed the test for whether particular actions could be considered cumulative impacts of the proposed action as whether the actions were so interdependent that it would be unwise or irrational to complete one without the others." Airport Neighbors Alliance, Inc. v. United States, 90 F.3d 426, 430 (10th Cir.1996) (internal citations omitted). As summarized in Muckleshoot Indian Tribe v. U.S. Forest Service: [A]n EIS must 'catalogue adequately the relevant past projects in the area.' It must also include a 'useful analysis of the cumulative impacts of past, present and future projects.' This requires 'discussion of how [future] projects together with the proposed . . . project will affect [the environment].' The EIS must analyze the combined effects of the actions in sufficient detail to be 'useful to the decision maker in deciding whether, or how, to alter the program to lessen cumulative impacts.' Detail is therefore required in describing the cumulative effects of a proposed action with other proposed actions. 177 F.3d 800, 809-10 (9th Cir. 1999) (quoting City of Carmel-By-The-Sea v. U.S. Dept. of Transp., 123 F.3d 1142, 1160 (9th Cir. 1997) (citations omitted)). Chapter 4 of the draft RMP is virtually devoid of any "useful analysis" or an adequate catalogue of projects with specific information regarding cumulative impacts associated with energy development and OHV use. See Draft RMP at 4-10 to 4-22, 4-438 to 4-440.3	BLM used the best data available at this scale of decision-making (landscape, rather than site-specific) based on the landscape-level decisions being made. Most decisions made in this RMP are programmatic in nature and do not effect a known specific acre or acres. In addition, the cultural resource data available is in a format that constrains its use in a programmatic, landscape level impact analysis. As such, a specific accounting of the number of cultural sites that will be impacted is not possible.
National Trust for Historic Preservation	Cultural Resources	More specifically, BLM actually claims that the preferred alternative will have reduced impacts from surface-disturbing activities because of increased restrictions combined with roadway improvements, increased recreation demand, and reasonably foreseeable mineral development would reduce the potential for loss or damage to significant regional cultural resources. In addition, this alternative provides more protective designations in areas	The Proposed RMP/Final EIS includes a revised cumulative impact analysis, noting more specific impacts to cultural resources. BLM used the best data available at this land use planning scale of

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		that contain significant cultural resources. 3 BLM uses estimated "footprint" acreage to determine the area of adverse effects. See Draft RMP/EIS at Appendix 21. This is simply inadequate to examine the cumulative impacts of energy development. To say that damage will only occur within the "footprint" of development ignores the concept that cultural resources derive significance from their environmental context as well as their direct physical manifestations. Draft RMP at 4-22. Not only does this statement lack any analytical discussion, it is incredibly misleading. In fact, this baseless cumulative impact statement regarding energy development is the exact same statement used for the conservation alternative, Alternative C, even though these two alternatives are markedly different on the issue of acreage available for leasing – Alternative C would "open" 0 acres with standard lease terms, while the preferred alternative would "open" 1,183,476 acres with standard lease terms. The cumulative impacts analysis of reasonably foreseeable development of oil and gas is also misleading. The preferred alternative proposes to develop 1,440 total wells during the life of the plan. Draft RMP at 4-5. However, there is no specific analysis about the current wells that exist and how new wells would add additional cumulative impacts, including new and upgraded roads, compression stations, pipelines, additional infrastructure and additional traffic. See id. at 4-9 to 4-22; see also Appendix 21. Also, BLM's identification of two recently approved coal bed natural gas projects in the PFO that have not yet begun creates some confusion as to how many new wells will be developed over the life of the RMP. These two projects are collectively projected to add 880 new wells between the next 5-10 years. Id. at 4-8. This represents over half of the preferred alternative's proposed new well total. Are these 880 approved wells part of the total projected wells in the draft RMP? If not, what are the cumulative impacts of 880 new wells on top of the projected 1,440 wells? BLM has not met its NEPA obligation to take a "hard look" at the cumulative impacts of proposed management decisions. "To 'consider' cumulative effects, some quantified or detailed information is required." Neighbors of Cuddy Mountain, 137 F.3d at 1379. Rather than addressing in detail the combined, cumulative impacts to cultural resources from the increasing development on public, private, and Reservation lands, the EIS makes broad, conclusory statements. Unfortunately, "[g]eneral statements about "possible" effects and "some risk" do not constitute a "hard look" absent a justification regarding why more definitive information could not be provided." Id. at 1380; see also Blue Mountains Biodiversity Project, 161 F.3d at 1213. In light of the Administration's increased interest in energy development, BLM has simply failed to provide an adequate analysis of cumulative impacts. We strongly recommend that BLM provide this information to the public in the context of a supplemental NEPA document, before condemning two million acres to increased energy development at the expense of other resource values. BLM should also provide specific analysis of how significant areas will be transformed by the cumulative impacts of current development and recreation and future actions permitted by the RMP. BLM could certainly provide this analysis for localized areas within the Price Field Office.	decision-making (landscape, rather than site-specific) and based on the landscape-level decisions being made. Most decisions made in this RMP are programmatic in nature and do not effect a known specific acre or acres. In addition, the cultural resource data available is in a format that constrains its use in a programmatic, landscape level impact analysis. As such, a specific accounting of the number of cultural sites that would be impacted would not be possible even if all sites were inventoried.
National Trust for Historic Preservation	Cultural Resources	C. BLM Fails to Adequately Analyze and Provide Support for Proposed Mitigation Measures. As part of the analysis, NEPA requires BLM to "[i]nclude [in the EIS] appropriate mitigation measures not already included in the proposed action or alternatives." 40 C.F.R. § 1502.14(f). The analysis should include "a discussion	BLM complies with all laws, policy and regulation when making land use plan decisions. These laws, regulations or policies do not require all cultural resources to be preserved in place or that all

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		of possible mitigation measures to avoid adverse environmental impacts . . . and must be reasonably complete in order to properly evaluate the severity of the adverse effects of a proposed project prior to making a final decision." Colorado Envtl. Coalition v. Dombeck, 185 F.3d 1162, 1173 (10th Cir. 1999) (internal citations omitted). "It is not enough to merely list possible mitigation measures." Id. Rather, mitigation measures should be supported by analytical data. Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1151 (9th Cir. 1998). The BLM must analyze mitigation measures in detail and explain how effective the measures would be. Northwest Indian Cemetery Protective Ass'n v. Peterson, 795 F.2d 688, 697 (9th Cir. 1986), rev'd on other grounds, Lyng v. Northwest Indian Cemetery Protective Ass'n, 485 U.S. 439 (1988); 40 C.F.R. §§ 1502.14(f), 1502.16(h), 1508.20. The Draft RMP fails to provide detailed information regarding mitigation measures to address adverse effects. Under the cultural resources section, the Draft RMP simply states that BLM will mitigate impacts to cultural resources resulting from authorized undertakings. Draft RMP at 4-93. Similarly, in the oil and gas section, the Draft RMP states that "[c]ultural resource values [for areas designated as "open" for leasing] would be preserved from damage from surface disturbance related to oil and gas development through mitigation methods such as avoidance and data recovery." Id. at 4-439 (preferred alternative). Furthermore, the Draft RMP makes no attempt to alter stipulations for already leased areas if necessary to control cultural resource impacts. BLM retains the ability to alter "conditions of approval" to reflect necessary protection of "unnecessary and undue degradation" of resources. The appropriate time to alter conditions of approval is during the RMP process. The Draft RMP states that for all alternatives, "[o]il and gas leases would be managed under the stipulations that were in effect when the leases were issued (RMP, MFP, Combined Hydrocarbon EIS (1984), EA on Oil and Gas Leasing (1988), three EISs addressing coal bed natural gas development ([1992, 1997, and FLPMA])). Draft RMP at 4-420.	effects to cultural resources be mitigated on a site by site basis. Cultural resource mitigation measures are directed by and contained in BLM policy and the National Programmatic Agreement. In implementing its Section 106 responsibilities, BLM identifies mitigation measures for specific cultural resource sites that could be affected by specific surface disturbing activities. Development of existing oil and gas leases must be in compliance with decisions in the RMP, subject to those valid existing rights. This RMP makes decisions, and sets the framework for future cultural resource allocations, with which future development will have to comply within the framework of valid existing rights.
National Trust for Historic Preservation	Cultural Resources	D. Other FLPMA Concerns: BLM fails to make an effort to inventory cultural resources as required by 43 U.S.C. §1711(a); BLM fails to ensure that the management objectives proposed will not have "unnecessary and undue degradation" of cultural resources. Id. § 1732(b). We suggest that BLM provide for adaptive management schemes that allow BLM to withdraw areas from approved destructive uses when they are identified as having cultural resources. Providing flexibility for future management decisions could prevent unnecessary and undue degradation of cultural resources.	Please see general comment response #9
National Trust for Historic Preservation	Cultural Resources	3. BLM Inappropriately Concludes that the Presence of Wilderness Review Lands Prevents Cultural Resource Inventory. BLM's conclusion that important cultural resource data is lost because lands under wilderness review cannot be developed, demonstrates BLM's distorted view of cultural resources. In the Affected Environment section, Draft RMP at 3-19 through 3-20, BLM states that the majority of cultural resource information comes from the mitigation of surface disturbing activities and that, because surface-disturbing activities are prohibited on lands under wilderness review, BLM cannot locate new cultural resource information. Id. at 3-20. BLM's stewardship obligation is not just tied to surface disturbing activities and extends to all of the land under BLM's control.	The final document clarifies the statement. The section the comment references does not state that cultural resource data will be lost due to wilderness review. It states the existing environment of cultural resource management, inasmuch that most cultural resource information in the Price Field Office is a result of cultural resource inventories during compliance with Section 106 of NHPA. In the context of this statement and the decisions in Chapter 2, it is unlikely that there would be extensive discoveries of new cultural resource sites in lands under wilderness review. The sites will still exist and inventories can still be performed, but

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			based on current trends, such inventories are not likely.
National Trust for Historic Preservation	Cultural Resources	2. BLM Fails to Integrate Compliance with Executive Order 13287 B "Preserve America". President Bush's recent Executive Order, entitled "Preserve America," reiterates BLM's responsibility to manage public lands in a spirit of stewardship of cultural and historic resources. Executive Order 13287 (Mar. 3, 2003), requires each Federal agency to "prepare an assessment of the current status of its inventory of historic properties," expanding on the requirement found in section 110(a)(2) of the NHPA. Id. § 3; see 16 U.S.C. § 470(h)-2(a)(2). Additionally, the President has required each agency to "ensure that the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties." Id. § 4 (emphasis added). The draft RMP should take stronger steps not only to ensure compliance with the NHPA, but also to ensure that BLM has considered and integrated President Bush's proactive stewardship agenda.	BLM has incorporated management actions which are responsive to Section 110 of the National Historic Preservation Act (NHPA) into agency operations. Measures in the RMP/EIS meet the spirit and intent of Section 110. As a matter of policy, BLM integrates existing Class I and Class III inventory data for use and consideration in the land use planning process. BLM has identified priority areas for pro-active inventory in the RMP. Further, site specific analysis and inventory is required prior to project implementation. BLM has met the requirements of Executive Order 13287. BLM is in compliance with NHPA, and will meet all requirements of Section 106 of the NHPA prior to making land use plan decisions. BLM is protecting cultural and historic properties through the designation of ACECs (see Chapter 2, ACEC section).
National Trust for Historic Preservation	Minerals and Energy Resources	The Draft RMP makes no attempt to alter stipulations for already leased areas if necessary to control cultural resource impacts. BLM retains the ability to alter "conditions of approval" to reflect necessary protection of "unnecessary and undue degradation" of resources. The appropriate time to alter conditions of approval is during the RMP process. The Draft RMP states that for all alternatives, "[o]il and gas leases would be managed under the stipulations that were in effect when the leases were issued (RMP, MFP, Combined Hydrocarbon EIS (1984), EA on Oil and Gas Leasing (1988), three EISs addressing coal bed natural gas development ([1992, 1997, and FLPMA])). Draft RMP at 4-420.	Because BLM recognizes valid existing rights, activities on existing leases could proceed under the terms of the existing leases. Therefore, stipulations proposed in the DEIS would apply only to new leases. The EIS evaluates several alternatives in detail to assure a balanced approach that will ensure protection of resource values while allowing opportunities for mineral exploration and production is considered. The management actions in the proposed RMP are designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Additionally, as exploration and production activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.
National Trust for Historic Preservation	Minerals and Energy Resources	The Draft RMP fails to provide support for "opening" areas determined to have "low" potential for oil and gas leasing as part of the reasonably foreseeable development (RFD) scenario. According to the draft, "[i]n areas of high potential, it is considered likely that oil and gas resources will be developed over the next 15 years. It is unlikely that any areas with low oil and gas occurrence potential will be developed in the next 15 years." Draft RMP at 3-53 (emphasis added). Why should areas with "low" potential be available for leasing? If these areas will	Please see general comment response #18

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		not likely be developed during the life of the RMP, shouldn't BLM revisit the possibility of opening these areas in the next RMP process?	
National Trust for Historic Preservation	Process and Procedures	III. FEDERAL LAND POLICY AND MANAGEMENT ACT (FLPMA) VIOLATIONS AND CONCERNS: A. BLM Fails to Adequately Balance All Multiple Uses in the Draft RMP/EIS. BLM has an obligation to balance land use management decisions in a way that recognizes "multiple uses." 43 U.S.C. § 1701(a)(7). All resources should be considered as equal, and therefore, unless directed by legislation or Presidential proclamation, BLM should make an effort to balance uses for the public good. In fact, the definition of multiple uses makes clear that BLM should manage "various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." Id. § 1702(c) (emphasis added).	Please see general comment response #1
National Trust for Historic Preservation	Wild and Scenic Rivers	Failure to Designate all Eligible River Segments as Wild and Scenic Rivers Violates FLPMA's "Unnecessary and Undue Degradation" Mandate.	Please see general comment response #84
National Trust for Historic Preservation	Wild and Scenic Rivers	In addition to concerns about ACECs, the preferred alternative proposes to designate only 10 of the identified 39 river segments (239 miles) as eligible for the National Wild and Scenic Rivers System (NWSRS). Draft RMP at 2-131 to 2-135, 4-21, 4-552 to 4-568. On the contrary, Alternative C proposes to designate all 39 river segments to the NWSRS, thereby providing for a protective management action of 730 miles. Id. at 4-18. It is absolutely incredible that BLM would offer to designate only 239 miles out of the 730 miles eligible for listing on the NWSRS, despite BLM's own eligibility determination. See Draft RMP at Appendix 2. Because many of the 39 river segments have outstanding, irreplaceable cultural and historic resources, the National Trust is extremely concerned about BLM's lack of effort to seek the full protection afforded by the NWSRS designation. Therefore, we strongly recommend that BLM designate all 39 river segments as eligible for the NWSRS, and that BLM provide in the greatest possible protection for these river segments.	Please see general comment response #25
National Trust for Historic Preservation	Cultural Resources	In planning for future actions, BLM must examine the potential environmental consequences of the decisions made and seek to balance all of the resources within the planning area. Management of multiple uses must not overshadow the BLM's stewardship responsibility to manage and maintain the historic and cultural resources in the area in a way that promotes their long-term preservation and use, and gives special consideration to the preservation of their historic, archaeological, and cultural values.	Please see general comment response #9
New England Trail Rider Association	OHV Route Identification	I am an administrator of New England trail rider association. We are a motorcycle trail riding association with 3500 members. Many of our members go out west to enjoy the wideopen spaces of riding out there. I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. We object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	See general comment responses #19, # 20, #31, #37 and #81

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		The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative. The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non-profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50-vehicle group size limit.	
New England Trail Rider Association	Recreation	Comment: Dispersed camping is important to our members and their families. It's impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. Comment: There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment responses #37 and #81
New Yorkers for Utah Wilderness	OHV Route Identification	We need to set aside a great deal of land who's purpose is to remain wild forever, open only to foot travel and lightly at that. Please consider that once scarred by off road vehicles, it is lost.	Please see general comment responses #12 and #19
New Yorkers for Utah Wilderness	Wilderness	I feel that the price RMP needs to protect the most special desert land anywhere from the ravages of 'civilization'.	Please see general comment response #109
Nichols Expeditions	Minerals and Energy Resources	Labyrinth Canyon, Desolation Canyon, the San Rafael area and Rabbit Valley. Seeing these national treasures scared forever by the presence of heavy machinery and drill platforms is a bad economic choice and a national disgrace. The revenue from the scant presence of oil reserves in this area will not exceed the economic benefit to our state and to the nation that preserving these areas from exploration and extraction will.	Please see general comment responses #18 and #101
Nichols Expeditions	OHV Route Identification	We urge you to make all the WSAs and routes within the America's Redrock Wilderness Act off limits to ORVs. We realize that the ORV industry has a large voice and there are many responsible users within that community, but there has to be a limit set to restrict their overzealous hunger and "no compromise - have it all" attitude on where it is appropriate to operate their vehicles. It is important to set aside some areas as "non-motorized" areas for the enjoyment and recreation of those who favor a quieter, pristine outdoor environment.	Please see general comment response #12
Nichols Expeditions	Socioeconomics	My wife and I live in Moab, Utah, and are the owners of Poison Spider Bicycles and Nichols Expeditions. Both of these businesses contribute to employment and the economic prosperity of SE Utah, and both businesses, and the welfare of our employees, will be affected by the outcome of your decision to allow energy exploration and	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation

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		drilling and unrestricted ORV use in the Management Plan.	of the economic contribution of 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. See the responses to specific comment #2649 and general comment response #132. The comment is incorrect in stating that the BLM plans to allow unrestricted ORV use. In fact, the Proposed RMP would restrict ORV use to designated roads and trails. See general comment response #19.
Nichols Expeditions	Socioeconomics	From the standpoint of creating jobs that last, an unscarred environment will encourage and maintain the tourist industry. The jobs created and maintained in the lodging, food service and guiding industries will continue to create prosperity for local residents for years to come. When energy companies come, they bulldoze, drill and leave. The only lasting things they leave are the visual scars and negative press our region will experience – read, “Red Rock Desert Spoiled By Energy Companies.” And, scant production will only generate a short lived local economic return, while any ongoing revenue will be going out of state to some corporate officers, or as a tax loss for a corporation due to non-profitable production.	Please see general comment response #132
Nichols Expeditions	Wilderness	We also urge the BLM to protect areas like the Desolation Canyon roadless area, Nine Mile Canyon, Labyrinth Canyon, Rock House Canyon, Christmas Canyon, Rabbit Valley, Maverick Canyon, South Franks Canyon, Horse Bench, and the Price River Wilderness Unit from energy exploration and drilling.	Please see general comment responses ##36 and #101
North American XJ Association	Alternative Maps	BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. This type of deception is unacceptable! The OHV community deserves to be treated with respect. The BLM maps must be updated to accurately portray the OHV designations outlined in each alternative.	Please see general comment responses #20 and #31
North American XJ Association	OHV Route Identification	It appears that the BLM has failed to use the extensive OHV route data in the form of maps and GIS data early on in the planning process to help determine what routes will be included in the OHV route designation maps. If these routes are not included, the result will be complete closure of entire OHV trail systems, of which we enjoy and use regularly. This is unacceptable, and I expect that a closer look will be taken and all OHV routes that have been submitted as part of this survey will be included on the final OHV route designation maps and designated as OPEN.	Please see general comment responses #19, #20 and #31
North American XJ Association	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment response #20
North American XJ Association	OHV Route Identification	There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment response #81
North American XJ Association	Process and Procedures	BLM has proposed many overlapping management "layers" in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, are not drawn along any recognizable geographic boundary making	Please see general comment response #37

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		compliance virtually impossible.	
North American XJ Association	Transportation and Access	I feel that the draft plan for Price RMP (San Rafael) is too restrictive and will severely limit ORV access the area. I have friends, some whom are members of our local clubs that can only access these trails via an OHV, they are unable to hike or bike these trails.	Please see general comment responses #10 and #80
North American XJ Association	Transportation and Access	All of the Chimney Rock/Summerville and Humbug trail systems should be left open. Furthermore, there should be designated links to the Arapeen Trail System. All existing roads and trails should be kept open for vehicle use.	Please see general comment responses #10, #20, and #31
Outdoor Industry Association	Minerals and Energy Resources	Desolation and Nine Mile Canyon SRMAs: Alternative D does not adequately protect these recreation gems. Oil and gas leasing should be open to leasing only with major constraints. Non-surface occupancies, where allowed, should have no exceptions, to protect the visual and audio experience for recreation users of this area. The best technologies and practices available should be used to establish SRMA boundaries that ensure no visual or audio impacts for boaters on the river or at key overlooks/access points on the river. Both Desolation and Nine Mile Canyons are used by recreation enthusiasts, and are gems that require special attention.	Please see general comment responses #18, #117 and #118
Outdoor Industry Association	OHV Route Identification	OHV Recreation: OIA strongly opposes the recommendation in alternatives A,B, and D that would allow open areas for OHV use. OIA strongly believes that OHV use on public lands should be allowed only on designated trails. It is a bad precedent to allow "open" use on any BLM lands. The agency should be moving to update all plans to allow OHV use only on designated trails.	Please see general comment response #19
Outdoor Industry Association	Recreation	OIA has one specific item of concern in Alternative D with respect to the recreation management in the San Rafael Swell: Alternative D would allow vehicle camping in undesignated, but previously impacted or resistant/resilient sites. OIA believes vehicle camping should be limited to developed or designated sites only, without exception. If desirable and appropriate for vehicle camping, the impacted sites mentioned above should be converted to designated sites. If not appropriate for camping, they should be rehabilitated and unavailable for camping use. OIA strongly opposes vehicle camping outside of designated sites, because of the severe damage this activity can do to the resource, and the impact of this activity on other recreation experiences in the Swell. We have heard many complaints about unauthorized and unmanaged motorized recreation (from other recreation users) in the San Rafael Swell, and believe that clarity to users is extremely important in restoring this area to one that provides a quality experience for all users. Requiring vehicle camping in designated sites creates that clarity.	Please see general comment response #15
Outdoor Industry Association	Recreation	In conclusion, OIA urges the BLM to adjust its management plan to better protect the wild recreation experiences and destinations in the Price Resource Management Plan area. This includes protecting the wild, scenic, and recreation qualities of the Green River; ensuring that river recreation corridors and outstanding river recreation experiences are not diminished by oil and gas drilling; maintaining the primitive recreation experiences now available in WSAs (should Congress release them from the Interim Management Plan); and managing motorized recreation appropriately in both the San Rafael Swell and throughout the Price Management Planning area.	Please see general comment response #14
Outdoor Industry Association	Wild and Scenic Rivers	The Green River is a world-class recreation destination that deserves Wild and Scenic River status. This river deserves protection "for the benefit and enjoyment of future generations" (Wild and Scenic Rivers Act of 1968).	Please see general comment response #27
Outdoor Industry Association	Wild and Scenic Rivers	Stretches through Desolation Canyon are deserving of, and should be classified as, "wild", and managed to those qualities making them available for such protections through a congressional designation.	Please see general comment responses #148 and #150

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Outdoor Industry Association	Wilderness	Wilderness Study Areas within the management plan: Should Congress release WSAs within the Price management plan, the areas should continue to be managed to maintain current primitive recreation experiences. In general, we support Alternative C as it pertains to this issue. In particular, only Alternative C maintains the current primitive recreation experiences in the San Rafael Swell SRMA, Desolation SRMA, and Labyrinth Canyon SRMA. We strongly oppose opening these areas to leasing and OHV use. Both of these activities would impact the quality of the current primitive and semi-primitive recreation experience.	Please see general comment response #112
PacifiCorp	Air	In addition, PacifiCorp currently is seeking an Approval Order from the Utah Division of Air Quality for a possible fourth unit at the Hunter plant. Seeking the Approval Order is one step in the process of determining whether to build this new unit at some time in the future. As of the date of these comments, PacifiCorp has not made a final decision whether or when to proceed with construction. That decision will be made in connection with PacifiCorp's Integrated Resource Plan which is on file in many public forums and is available at www.pacifcorp.com. The various references scattered throughout the DRMP imply that constructing Hunter Unit 4 is a more firm and imminent plan than is the case. The DRMP should be corrected to reflect the actual planning status as we have described it. Also, the following comments apply to the specific provisions noted: Section 1.6.1-- As the PFO notes in various parts of the DRMP, the air shed in the area of the DRMP is categorized as Class II. Section 1.6.1 notes the intention for the final RMP to "address protection of Class I air sheds and maintenance of regional haze standards." PacifiCorp presumes this means that the PFO intends to impose requirements assuring this result as a condition of allowing any future emission-generating activities to be located on PFO lands. PacifiCorp emphasizes that this intention should not carry over to existing or new emission sources, such as PacifiCorp's three power plants, coal mines or associated facilities that are located on non-BLM lands adjacent to the area of the DRMP. In the latter case, the PFO's ability to influence air permit requirements for existing or new emission sources resides solely in its right, as a federal land manager, to provide comments to the Utah Division of Air Quality in limited circumstances where emission sources may impact PFO lands. See, for example, Utah Administrative Rule, 8307-401-4(1). The DRMP should confirm this role for the PFO in the DRMP statements about air quality.	Reference to the possible Hunter Power Plant Unit 4 is “may be built” which is not definite. No change has been made. The goals, objectives and common to all management in the Proposed RMP/Final EIS have been written to clarify BLM’s role in management of air quality.
PacifiCorp	Air	Section 2.7.1 -- Again, although this may be a proper statement in regard to emission-generating activities located on DRMP lands, it does not apply to existing or new emission sources located outside of the DRMP. The DRMP should affirmatively confirm this.	The Proposed RMP/Final EIS explains that the air quality objectives apply to public lands only.
PacifiCorp	Air	Section 3.2.1 - This section purports to describe "the air resource within the PFO" but lists, at §3.2.1.3, PacifiCorp's Carbon, Hunter and Huntington coal-fired power plants as "major sources of air pollution in Carbon and Emery counties." This statement implies that all sources within county borders are also sources within the DRMP area or, at the very least, that sources within county borders but outside the PFO have an impact on "the air resource' within the PFO. As noted, PacifiCorp's three power plants are not located on lands within the PFO and are not subject to regulation by the PFO under the DRMP. It is not clear why the DRMP even describes sources of air pollution "in Carbon and Emery counties" instead of describing only those sources specifically located within the PFO. PacifiCorp takes exception with the description to the extent that the PFO or any other agency or group intends to use this description or reference in any way to directly or indirectly manage emissions from PacifiCorp's generating facilities in connection with the DRMP or the final RMP. In addition, based on the lack of information	The major stationary sources cited generate significant emissions that impact regional air quality, including air quality in the PFO. The Proposed RMP/Final EIS Section 3.2.1 has been expanded to include a better discussion of the existing air quality within the PFO including a reference to a Utah Division of Air Quality Report (2004) as the source of the information. This provides ample foundational support for the notion that emissions from the power plants impact air quality in the PFO. It is not the BLM’s intention to usurp the State of Utah’s and EPA’s regulatory

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		provided, PacifiCorp takes exception with the statement that these three PacifiCorp plants, among other sources, cause "the greatest amount of air pollution emissions in the PFO." To the extent the PFO contends that emissions from these plants drift into the air shed above PFO lands and thus make up the largest percentage of pollutants within that air shed, PacifiCorp takes exception to this statement as lacking foundational support. Moreover, the Air Quality Baseline and Analysis Report (2003) noted in §3.2.1 is not included in the Volume 2 of the DRMP as may be expected. The DRMP should be corrected to address each of these concerns.	management of these facilities.
PacifiCorp	Air	Section 4.2.2- As to "Existing Power Plants" at page 4-7, PacifiCorp agrees that the DRMP should presume continued operation of the Carbon, Hunter and Huntington power plants as noted in this section, PacifiCorp also agrees that these facilities "are sources of NOx", although it is not clear why this statement is made in this manner. PacifiCorp notes that it has announced plans to significantly reduce NOx, S02 and PM emissions at its Huntington Unit 2 through the installation of approximately $120 million in new controls expected to be on line in 2007. In addition, PacifiCorp is continually exploring new ways to reduce NOx and other emissions at each of the three plants surrounding the PFO. As to "Potential expansion of the PacifiCorp Hunter Plant" as noted at page 4-7, the statement that this potential new unit "would increase current NOx and SOx emissions" does not reflect PacifiCorp's current strategy for obtaining an Approval Order (air permit), Rather, PacifiCorp is proposing to receive an Approval Order using a "netting" approach under which new controls will be added and sufficient emission reductions will be achieved at existing Hunter units to make room for adding a fourth unit without increasing overall plant emissions. In other words, under this permit approach, there will be no more NOx or SOx emissions from the Hunter plant after adding unit 4 than currently exist. The DRMP should be amended to reflect the current permit strategy for this possible new unit (along with a more accurate description of the planning process for this unit as described above).	Section 4.7.2 of the Proposed RMP/Final EIS addresses this concern.
PacifiCorp	Air	"Affected Environment/Description" -- the last bullet on page 4-27 states that the average visual range [within the PFO] is currently 50 miles, which has decreased from the historical visual range of 115 miles in 1977." PacifiCorp disputes this conclusion, questions how it is documented and requests further information about the methods used to reach this conclusion. "Assumptions"- At page 4-28, "degradation in air quality that would impact Class I air sheds" is not a sufficient descriptor for when impacts should be considered as significant. Some impacts, even in Class I areas, are acceptable under current state and federal law: Rather, reference to existing air quality requirements should be made as the basis for determining significant impacts. "Assumptions" - At page 4-28, the assumption is not correct that "Wilderness Areas (i.e., Mexican Mountain, San Rafael Reef, Sits (sic) Mountain, and the lower Green River)" deserve some kind of special treatment as. Class I air sheds or otherwise. Only Utah's five national parks are Class I areas; all other air sheds, including any proposed Wilderness Areas within the DRMP, are Class II areas. The DRMP should not lump established Class I areas in with proposed wilderness areas for air planning purposes and the DRMP should be corrected to reflect this.	The Proposed RMP/Final EIS has been revised related to visibility and assumptions for analysis.
PacifiCorp	Lands and Realty	Renewable Energy: With regards to renewable energy, the BLM, in conjunction with the Department of Energy and National Renewable Energy Lab (NREL) developed a report in February 2003 titled "Assessing the Potential for Renewable Energy on Public Lands" Similar to many utilities, PacifiCorp is interested in the potential to	As indicated in the Draft RMP/EIS and Proposed RMP/Final EIS, wind energy exploration and development would be subject to site specific

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		develop these resources in the future. Based upon our meeting with the BLM PFO on November 8, 2004, it is our understanding that the BLM believes these resources to be limited within the PFO planning area, however, there is some gross scale GIS data available as part of this report that could be used to assist in determining lands potentially suitable for the development of wind and energy resources. Also, the recent BLM Solar Energy Development Policy (October 20, 2004) and Interim Wind Energy Development Policy (October 16, 2002) should be referenced as part of these planning efforts.	NEPA analysis. Proposals for ROWs for wind energy exploration and development would be considered on a case-by-case basis.
PacifiCorp	Minerals and Energy Resources	The location of our facilities in between and sometimes straddling the borders of both PFO and Forest Service lands presents the possibility that PFO and Manti-La Sal forest planning efforts will not be sufficiently coordinated such that the cumulative result adversely impacts PacifiCorp operations.	BLM must coordinate planning with the land use planning and management programs of other federal departments, the State of Utah, local governments in the planning area, and Indian tribes. Plans, including the Manti-LaSal National Forest Land Use Plan, that affect lands within the field office were reviewed for decisions, issues, and management prescriptions to be carried forward or considered for consistency with the new RMP. Also, the BLM is cooperating with the US Forest Service in the preparation of an oil and gas leasing EIS for the Manti-LaSal National Forest.
PacifiCorp	Minerals and Energy Resources	As a general matter, the DRMP is not clear whether the mineral estate addressed by the DRMP will actually be administered by the BLM. In other words, although the DRMP makes clear what surface lands form the PFO, it is not clear what mineral estate is intended to be included within the DRMP and exactly how the mineral estate will be managed as compared to the surface lands of the PFO. PacifiCorp urges the PFO to more clearly describe the surface areas as compared to the mineral estate and how each will be managed in connection with and as compared to the other. Also, site-specific data for existing tracts and mines for the mineral estate of the DRMP is seriously out of date - so much so that it is questionable whether the available information is sufficient to provide proper notice and allow for sufficient public comment. The final RMP should be updated to reflect the current mining situation around the Wasatch Plateau and Book Cliffs. We believe this would portray a different and more realistic picture of the "mineability" and economic recoverability of present and remaining reserves.	Maps 2-30 through 2-34 of the Proposed RMP/Final EIS clearly show the lands on the Wasatch plateau as "Federal Minerals Open to Leasing Subject to Forest Service Constraints" or managed by the Forest Service. The minerals decisions pertain to lands with Federal surface and minerals. The RMP will not make decisions for split-estate lands because they have Federal minerals but private surface where land owner agreements or consent would be required.
PacifiCorp	Minerals and Energy Resources	Additional issues that need to be examined when determining the mineability and/or demonstrated reserve of the remaining areas: Adequacy of exploration data - just because a tract contains enough drill holes to show a "demonstrated" reserve base, there may not be sufficient geologic, geotechnical, and coal quality data to show that the reserve is mineable or financially attractive in all market conditions. Given that the surface lands overlying many of these areas are actually managed by the US Forest Service, the DRMP should also consider whether further exploration of these mineral tracts will be possible given that some of the areas are under consideration for roadless/wilderness--status, In that case, PacifiCorp questions whether anyone will have the financial incentive to explore these areas and whether the DRMP should list them as available for exploration and development.	This RMP does not make decisions for land managed by the U.S. Forest Service. Activities on Federal mineral ownership under land managed by the U.S. Forest Service is subject to their land use plan decisions and their concurrence. BLM is cooperating with the U.S. Forest Service in the preparation of an Environmental Impact Statement for Oil and Gas Leasing on the Manti-LaSal National Forest.
PacifiCorp	Minerals and Energy Resources	Coal Reserves Calculations- Since the Utah Geological Survey is listed as the primary source of information for this report, comments are appropriate about the UGS methods for determining coal mineability and reserves. The UGS report (UGS Circular 100) includes thickness categories of 4 to 6 feet; and 6 to 10 feet. Practical experience	Please see general comment response #77

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		in PacifiCorp's Utah mining operations (Deer Creek, Cottonwood, Wilberg, Trail Mountain and Des-Bee-Dove mines) indicates that 7 feet is a more realistic minimum mining height for modern, efficient mining. The BLM report, on page 8, indicates that the average thickness of coal beds listed in the resource estimates is just over 6 feet, which implies that at least half of the resource is unminable using a 7-foot minimum mining height. Table C-1, also on page 8, is a confusing table in that it supposedly shows "mineable" resources, while showing columns labeled "Identified" and "Hypothetical" resources and a "Grand Total," Does "Identified" mean "demonstrated"? Is "Identified" a defined term, if so please clarify, The UGS definition (in UGS Circular 100) of a mineable coal bed includes partings in a given seam up to 1 foot in thickness, as long as the total thickness of the parting or partings does not exceed 20% of the total thickness. Our experience has shown that any coal containing 20% partings, though physically mineable, will have an ash content too high to stand on its own merit. This type of coal will require blending to be of any value.	
PacifiCorp	Minerals and Energy Resources	Page 5 -- Study Methodology - Paragraph 2: This section mentions defining the extent of each mineable coal bed and the distribution of thickness within that bed, but the report contains no maps showing any of the individual beds. Absent adequate mapping information, this portion of the DRMP provides inadequate information to provide constructive comment.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 6 - Study Methodology - Paragraph 4: This section mentions lack of coal quality and geotechnical information for "delineated tracts." Delineated tracts should be mentioned by name, by seam, and by location, and identified on a map. Again, absent adequate map resources, constructive comment is not possible.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 10 Figure C- I: This figure should have a reference map showing exactly where the cross-section is drawn. Since this is a coal resource report, the cross-section should show the local coal seams and mines and their relationships to the different sandstone members.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 12, 13, 14, 17, 18, 20, 21, 16 -- Coal Quality Statistics: Coal quality statistics are tabulated showing the coal quality characteristics of the seams in place. We believe that there should also be some sort of tabulation showing coal quality as produced (historical production data), which takes into account the out-of-seam dilution and added water of the mining process. This would give a more realistic idea of what could actually be produced from a given seam or given area.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 15 - Coal Resource's - Paragraph 2: Remaining coal resources are mentioned in several seams in the Book Cliffs coal field, but no reference is made as to the location of these resources. This section should have a map.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 16 - Coal Geology - Paragraph 2: This section states that normal faults within the Wasatch Plateau coal field interfere with mining, but there is usually sufficient room between faults to conduct mining. This statement is attributed to Doelling, 1972 (32 years ago). Normal faulting and grabens create enormous problems for modern mining operations. Faults must be thousands of feet apart not to create mining problems in a modern longwall mine. If a resource area contains faults, serious mining and resource recovery problems will be certain. The Final Price RMP should be corrected to account for modern mining methods.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 17 - Coal Quality - Paragraph 2: Coal resources in the Wasatch Plateau are resin-rich. Although resin recovery appears to be dead, the resin does add significant heat value to the coal. This paragraph mentions that the quality data have not been updated with new names to reflect new understanding of the stratigraphic relationships of the coal seams. This is one of the most serious problems with reports of this type - that the coal bed names that each mining company is accustomed to using for years are being updated or renamed without adequate illustrations to show how the beds have been correlated or re-correlated. This makes the DRMP difficult	Please see general comment response #77

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		to follow and comment on.	
PacifiCorp	Minerals and Energy Resources	Page 18 - Coal Resources - Paragraph 1: According to this paragraph, there are 1,054.8 million tons of in-place coal in the Wasatch Plateau field. Of this, 331.7 million tons are "likely to be mined" during 2003 - 2017 (a rate of 24 million tons per year). The other 723.1 million tons are "available" for mining 2018 - 2032. Because no recovery factor has been applied, the implication is that all 1.0548 million tons are mineable and recoverable. The Final Price RMP should apply a realistic recovery rate given today's production with consideration of known adverse geologic conditions as experienced from mining in these Utah coal fields.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Pages 23 - 25 Production Figures: All of these graphs need to be updated. Data is available from the State of Utah through 2003.	The coal production estimate for the study area utilized in the Proposed RMP/Final EIS is identified in Table 3-50, which is taken from the 2006 Economic Report to the Governor.
PacifiCorp	Minerals and Energy Resources	Page 30 - Coal Markets - Paragraph 2: This paragraph states that the "easily mined" coal will be depleted in the next 15 years. Based on current problems at all the operating mining companies in the region, an argument can be made that "easily mined" coal in the area has already been depleted. The Final Price RMP should reflect this fact.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Page 26 - 31 - Current Production and Exploration Activities: This entire section is out of date and needs to be updated. The Utah Energy Office has published data through the end of 2003.	The coal production estimate for the study area utilized in the Proposed RMP/Final EIS is identified in Table 3-50, which is taken from the 2006 Economic Report to the Governor.
PacifiCorp	Minerals and Energy Resources	Page 31 - 34 Geologic Potential - Book Cliffs Field - Paragraph 1: Old information in this section makes it completely misleading. Since 2001, Westridge and Dugout mines have experienced mining problems, and Lila Canyon mine has still not been able to get started due to lawsuits.	The coal production estimate for the study area utilized in the Proposed RMP/Final EIS is identified in Table 3-50, which is taken from the 2006 Economic Report to the Governor.
PacifiCorp	Minerals and Energy Resources	Paragraph 2: Various tracts are referred to which supposedly contain 275 million tons of recoverable coal. A detailed map of these tracts needs to be included to allow the reviewer to better understand and comment on the remaining reserve picture.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Wasatch Plateau Field - Paragraph 1: The remaining reserves in the Wasatch Plateau field are stated as 686 million tons of recoverable reserves. A map showing the location of these reserves needs to be included to allow the reviewer to better understand and comment on the remaining reserve picture	Please see general comment response #77. Map 3-25 of the Proposed RMP/Final EIS shows the location of coal reserves.
PacifiCorp	Minerals and Energy Resources	Paragraph 2: The Flat Canyon tract is mentioned as one of the unleased federal coal reserves likely to be mined in the next 15 years. Major hydrologic issues still unresolved, however, make the timing of mining this tract uncertain. The Final Price RMP should reflect this fact.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Emery Coalfield -- Paragraph 1: Estimated production from this field is shown as between 5 to 30 million tons over the next 14 years. Unresolved hydrologic issues have so far prevented this operation from using second-mining methods. It is unclear at this time if productive longwall mining will ever be permitted in this area.	Please see general comment response #77
PacifiCorp	Minerals and Energy Resources	Clarifications: Page 4-7 states, concerning the North Horn Coal Mine, that "the proposed North Horn coal mine is sponsored by PacifiCorp/ScottishPower ': While this particular coal tract could be instrumental in PacifiCorp's long range fueling strategy for its coal fired generation units in Emery County, no formal sponsorship has been voiced	The information on page 4-7 and on page 29 of Appendix 25 in the Draft RMP/EIS has been placed in Section 4.7.2 of the Proposed RMP/Final EIS.

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		by this company. If and when this coal tract goes on sale, it will be sold on a competitive bid basis to any interested party. This is consistent with how all coal lease tracts are sold. This statement should be corrected as noted herein. In addition, the commentary in Appendix 25 at page 29 is not totally accurate and PacifiCorp offers the following corrections: (1) The Trail Mountain Mine was dosed because it had exhausted the economical recoverable reserves, and (2) The company's interest in leasing the Cottonwood Tract has not diminished. In fact, PacifiCorp sent a letter to SITLA requesting that this tract be brought up for sale.	The text originally on page 4-7 has been changed to eliminate the reference to PacifiCorp as sponsor of the proposed North Horn coal mine. The language in Appendix 25 referred to in the comment has not been carried forward into the Proposed RMP/ Final EIS.
PacifiCorp	Process and Procedures	The DRMP does not sufficiently describe the existing level of coordination (although PacifiCorp is aware that some coordination does take place), We urge the final RMP to reflect the specifics of that coordination and, more importantly, to describe the framework for coordination to continue into the future.	Please see general comment response #145
PacifiCorp	Process and Procedures	PacifiCorp requests a minimum 90 day extension to the deadline for the Public Comment Period for the Price Field Office(PFO) Resource Management Plan (RMP) Draft Environmental Impact Statement (DEIS). The comment period deadline is now set for October 15, 2004 which simply does not provide sufficient time for PacifiCorp to consider the many pages of information and maps contained in the RMP/DEIS materials and provide thoughtful and meaningful comments. PacifiCorp must have sufficient time to analyze the alternatives, determine the impact and provide input to BLM.	Please see general comment response #125
PacifiCorp	Soil, Water and Riparian	• PacifiCorp's Huntington Plant diverts water from Huntington Creek for use at the plant. The water in Huntington Creek originates, in part, in the Manti-La Sal Forest. The water then flows through stream segments that cross Forest Service, state, private and PFO lands before arriving at the plant for diversion and use. Water not diverted at the plant or for other uses downstream ultimately finds its way to the San Rafael river within the area of the DRMP. Wild & Scenic River (W&SR) issues under the DRMP have the potential to impact the use of water from Huntington Creek. Likewise, W&SR issues in connection with forest planning have the potential to impact water use from the very same Huntington Creek. It is conceivable, without proper coordination, that the PFO and the Manti-La Sal forest could come to somewhat differing conclusions in regard to W&SR status of various connected stream segments in a way that leaves PacifiCorp's Huntington Plant literally caught in the middle based solely upon its location.	Please see general comment response #72
PacifiCorp	Transportation and Access	Existing Power Lines: A review of PacifiCorp's existing power line system identified that the major high-voltage lines (345kV) across the Price Field Office (PFO) planning area appear to be considered in context with the location of proposed utility corridors for Alternatives A, B, C, and D, including the following: ▪ Emery to Huntington to Mona - single circuit ▪ Huntington to Spanish Fork - single circuit • Emery to Camp Williams - single circuit • Huntington to Four Corners - single circuit • Emery to Sigurd - two lines on separate structures We have prepared attached maps with existing PacifiCorp power lines and the proposed corridors for Alternatives A through D that are displayed for your reference. ,, In locations where PacifiCorp power lines do not appear to be precisely contained within each corridor associated with Alternatives A-D, PacifiCorp has assumed that this discrepancy is due, in part, to data sources and level of mapping detail (either PacifiCorp's or the PFD's). In these locations it is assumed that the proposed corridors are associated with the "on-the-ground" location of these	To address the discrepancy in power line location for Utility Corridors the Price Field Office obtained an updated transmission line file from PacifiCorp in March 2005. Utility Corridors in all alternatives A, B/D and C have been updated to include the lower voltage lines as noted by PacifiCorp, and to include the improved power line locations from the file supplied by PacifiCorp.

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		existing facilities. In these locations, PacifiCorp suggests continued work with the BLM PFO to rectify any discrepancies and update this information accordingly. However, certain lower voltage lines such as 138kV lines from Helper (Royal Substation) and other 46kV lines between Helper (Helper Martin Substation) and Hiawatha do not appear to be depicted in association with any of the corridors for the alternatives. The designation of the location of these utility corridors should be modified to include these existing lower voltage lines. In addition, Section 3.3.4.2 on page 3-51, does not list the major existing right-of-way utility corridors and should identify them as such.	
PacifiCorp	Transportation and Access	Designated Utility Corridors: It is our understanding that the Price DRMP/EIS will combine and supersede previous planning documents for the field office area. These previous documents included the 1983 Price River Management Framework Plan and the 1991 San Rafael Resource Area RMP. A review of the San Rafael Resource Area RMP indicated that utility corridors were one mile wide, centered on the existing right-of-way (Section 4211, page RMP-24, 1989). The 1991 RMP also identified avoidance areas and exclusion areas, as depicted on map RMP-10 Rights-of-Way Management. The new Draft RMP/EIS fails to provide existing corridor widths, a list of major corridors (as previously described), or a reference to the previous planning documents. According to the BLM Land Use Planning Handbook H-1601-1, decisions made for Lands and Realty pertaining to right-of-way corridors need to identify "right-of-way corridors, avoidance areas, and exclusion areas, along with any general terms and conditions that may apply" (Appendix C, page 13, D.1.g). Also, the plan should "identify issuance of site specific right-of-way grants and authorizations" (Appendix C, page 14, D.2). And finally, the BLM should "consult with parties to interagency agreements or MOUs relating to corridor identification or use, and the Western Utility Group must be consulted when developing decisions affecting utility use" (Appendix C, page 14, D.3). As documented in the RMP (Executive Summary, page ES-4, and Chapter 1, Section 1.,6.11, page 1-11), one of the main planning issues identified for the RMP addresses future energy needs stating "community growth and development and changing use of public lands require that many goals and objectives of lands and really management be revisited. The RMP will ensure that the plan... "· Designate transportation and utility right-of-way corridors (including avoidance areas and exclusion areas) · Identify access needs"	Utility Corridors in the RMP/EIS are one-half mile (2640 feet) from the centerline of the corridor or a total of one mile (5280 feet) wide. Avoidance and exclusion areas were not identified in map form, however, ACECs and WSAs were. The Western Utility Group maps along with meetings and consultations with PacifiCorp were used to generate the corridors shown on Maps 2-53 through 2-55 in the Proposed RMP/Final EIS.
PacifiCorp	Transportation and Access	The primary documentation we were able to find in the Draft RMP/EIS that identifies where the above-mentioned items were addressed regarding existing utility right-of-way corridors and potential new utility corridors is mentioned primarily in Section 2.16 (pages 2-92 to 2-94) and Tables 4-32 through 4-35. However, the description of this information is difficult to interpret without the presentation of avoidance and exclusion area(s) information on a map in conjunction with the existing and proposed utility corridors. In this manner, the "no action" and alternatives (including preferred Alternative D) could be evaluated in terms of potential physical conflicts with existing facilities and potential future planned facilities (see discussion on Reasonable and Foreseeable Development later in our comments on Lands and Realty). In order to assist the BLM PFO in this regard, PacifiCorp has undertaken its own effort to interpret the DRMP/EIS for avoidance and exclusion areas, as presented in the series of maps attached to this comment letter as PDF files. The maps are listed below:	Avoidance and exclusion areas are not identified in map form, however, ACECs and WSAs are, as shown on maps 2-45 through 2-49 and 3-28 in the Proposed RMP/Final EIS. Corridors are shown on Maps 2-53 through 2-55. The Western Utility Group maps along with meetings and consultations with PacifiCorp were used to generate the corridors.

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		* Alternative A Corridors - Avoidance and Exclusion Areas • Alternative B Corridors - Avoidance and Exclusion Areas • Alternative C Corridors - Avoidance and Exclusion Areas • Alternative D Corridors - Avoidance and Exclusion Areas • Western Regional Priority Corridors with Alt. D Avoidance and Exclusion Areas • Wilderness Study Area Map	
PacifiCorp	Transportation and Access	As discussed with the BLM PFO during our meeting on November 8, 2004, it was noted that certain sections of the document seemed to conflict in regards to designation of avoidance and exclusion areas, particularly with respect to ACECs. For example, Tables 4-32 through 4-35 (Land and Realty Actions by ACEC) are not consistent with ACEC designations for each alternative in Section 2.16, pages 2-107 thru 2-130, along with Maps 2-43 thru 2-46. In preparing our interpretation of the avoidance and exclusion areas in context with existing transmission lines and utility corridors, we utilized the information presented in Section 2.16 - Alternatives Summary Table for each alternative as directed by Floyd Johnson, Assistant Field Manager, during our meeting on November 8, 2004. In this regard, we suggest clarification of the ACEC designations so that the reader can correctly interpret potential conflict areas. As a result of this DRMP/EIS interpretation effort, PacifiCorp has identified several areas of potential conflict between utility corridors, ACECs, and other special area designations as identified by the various management alternatives. Designation of these lands should not preclude PacifiCorp from continued access to existing energy facilities. In addition, it should also not preclude the potential for energy development including the addition of future lines in the same corridors or eliminate other reasonable and foreseeable energy-related facilities. Potential conflict areas include: • Alternative A: Rock art ACEC sites west of Hwy 6/191 and east of Hwy 10; oil and gas closure area west of Price • Alternative B: Rock art ACEC sites west of Hwy 6/191 and east of Hwy 10; San Rafael Canyon, Nine Mile, and Lower Green ACECs; Green River WSA, Recreation designation near town of Green River; sage grouse lek habitat north of Helper; oil and gas closure area west of Price • Alternative C: Rock 4t-t ACEC sites west of Hwy 6/191 and east of Hwy 10; San Rafael Canyon, Nine Mile, Lower Green, 1-70 Scenic, and Gordon Creek ACECs; Green River WSA Scenic and Recreation designation near town of Green River; Price River WSA Scenic designation • Alternative D: Rock art ACEC sites west of Hwy 6/191 and east of Hwy 10; San Rafael Canyon, and Nine Mile ACECs; Green River WSR Recreation designation near town of Green River; sage grouse lek habitat north of Helper; oil and gas closure area west of Price	Please see general comment response #38
PacifiCorp	Transportation and Access	There appears to be no avoidance and exclusion areas specifically identified in context with Alternative C as presented in Section 2.16 - Alternatives Summary Table, on page 2-92. We suggest that this section needs to be clarified as to whether or not there are avoidance and exclusion zones for Alternative C (such as areas closed to oil & gas, areas classified as VRM Class 1, etc.). In addition, other alternatives (A, B, and D), clearly define that major rights-of-way proposed outside of designated corridors would require a plan amendment, however, Alternative C does not stipulate how these facilities would be considered and should address such information accordingly.	Table 2-16 in the Proposed RMP/Final EIS states that WSAs and what specific ACECs, , would be ROW exclusion areas in all the alternatives, including Alternative C.
PacifiCorp	Transportation and	Western Regional Corridor Planning Partnership Priority Corridors: A review of the Western Regional Corridor	Western Utility Group maps, specifically the

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	Access	Planning Partnership Priority Corridors (dated July 2003) indicates a location discrepancy between Priority 2 corridors and the PF'O corridors proposed in Alternatives A, B, C, and D, particularly heading northeast from Price towards Nine Mile Creek along existing pipelines and to the west and south of the town of Green River. This discrepancy needs to be addressed, and we suggest a coordinated effort between PacifiCorp, the Western Utility Group, and PFO. The Draft RMP/EIS should also note that designated corridors apply only to BLM lands and do not include those portions that cross state and private lands.	"priority_utm" file was used to compile the Transportation Utility Corridors. For the "Price to Nine Mile" corridor, Alternative A follows the "priority_utm" file allowing for "differences in data sources and level of mapping detail" as already noted by PacifiCorp. Alternatives B, C and D follow alternate routes from Price to Nine Mile as proposed by Colorado Interstate Gas named "Ruby Pipeline." Alternates B, C, and D were created to provide routes avoiding resource conflicts in Nine Mile Canyon. For a route "West and South of Green River," a southern corridor was included in an area without an existing transmission line that links up to the existing 345 kV corridor in Alternatives A, B, C and D, again allowing for differences in data sources and level of mapping detail.
PacifiCorp	Transportation and Access	Wilderness Study Areas and Non-WSA Lands with Wilderness Characteristics: As depicted on the WSA map prepared by PacifiCorp (based on the interpretation of the DRMP/EIS and BLM GIS data), there are several existing power lines (and potential future lines) that may potentially be affected by protective designations applied to WSA and non-WSA lands. In particular, the Huntington to Four Corners (via Green River) 345kV transmission line corridor (including other potential new lines to Grand Junction, and Four Corners) may be affected by the Price River, Mexican Mountain, Lost Springs Wash and Sid's Mountain areas. A 138kV transmission line corridor from Price to Green River along Hwy 6/191 could also be affected by the Desolation Canyon area, and should an additional corridor be required in the southeastern portion of the planning area, the designations of the San Rafael River and Sweetwater Reef could eliminate potential corridors from future consideration, Designation of these WSAs and non-WSA lands should not preclude PacifiCorp from continued access to existing energy facilities. In addition, it should also not preclude the potential for energy development including the addition of future lines in the same corridors or eliminate other reasonable and foreseeable energy-related facilities.	Please see general comment response #38
PacifiCorp	Transportation and Access	Operation and Maintenance Issues: As stated previously, PacifiCorp maintains a network of existing transmission lines within the PFO critical to our overall system. Access for line trucks, four-wheel drive vehicles, ATV's and other support equipment is needed to repair, rebuild, upgrade, and maintain this critical electrical infrastructure. All of the alternatives presented in the DRMP/EIS should account for existing rights-of-way access to these transmission lines, and alternative management prescriptions should not preclude PacifiCorp from continued access to these transmission lines and the rights-of-way required to operate and maintain these facilities.	Please see general comment response #38
PacifiCorp	Transportation and Access	Reasonable Foreseeable Development: In conjunction with future energy development needs, PacifiCorp has identified the need for new power lines that may be developed over the next 5-10 years to support increasing capacity, load growth, and address reliability issues. These new lines should be accounted for in the Reasonable Foreseeable Development scenarios, along with cumulative impacts sections of the Draft RMP/EIS (Section 4.2.2).	Power plant expansions are considered in section 4.2.2 of the Draft RMP/EIS and 4.7.2 of the Proposed RMP/Final EIS. Additional infrastructure for power transmission is considered an extension or enlargement of existing ROWs that have been enabled in the existing transportation utility corridors. At this time, additional future unspecified

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			transmission lines would be impossible to consider and analyze.
PacifiCorp	Transportation and Access	The Western Electric Coordinating Council (WECC), a regional coordinating council for western utility groups, states that interconnected transmission systems should be planned to avoid excessive cascading outages with the loss of any two transmission circuits in a common corridor. In addition, utilities must also consider the loss of all lines in a common corridor and evaluate the effects of such an outage. Common corridor outages could be caused by fires, landslides, high winds, salt storms, natural gas pipeline explosion, airplane crash, sabotage, etc. Consequently, new high-voltage transmission lines need to be appropriately separated to reduce liabilities from multiple outages and homeland security issues. If adequate separation is not maintained, this will eventually result in the need for more transmission lines than would otherwise be needed. PacifiCorp prefers that these new lines be located with adequate separation from existing lines in order to meet reliability standards and reduce the risk of losing all lines within an entire corridor. If absolutely necessary, the new lines could be built in some of the existing corridors if the corridors are wide enough or if the corridors could be widened to allow a minimum one-mile separation from the existing lines. Otherwise, new corridors should be considered as part of the RMP update process. The list below includes potential future new 345kV transmission lines that PacifiCorp might build, and sufficient corridors should be identified in the plan. ▪ Emery to Huntington to Mona • Emery to Four Corners • Emery to Spanish Fork ▪ Emery to Grand Junction PacifiCorp advocates for development of suitable, wide corridors for planning purposes in the RMP in order to account for topography, land use, engineering, and access issues, separation from other proposed facilities (e.g. transmission lines, water and gas pipelines, etc.), visual resources, sensitive plant and wildlife species, and cultural resources. Once corridors are analyzed for compatibility with RMP resources, then formal designation of these utility corridors would avoid the need for plan amendments an future projects. The plan should also address in more detail corridors required in conjunction with the development of generation facilities (as discussed under Minerals and Energy Development), as well as potential renewable energy sources (wind and solar energy).	Please see general comment response #38
PacifiCorp	Visual Resources	By the nature of its business, PacifiCorp constructs large and highly visible electrical transmission towers, power generating stations, support roads and other facilities within and surrounding the Price RMP area. To some segments of the population, such facilities may be considered as impairing the quality of scenic (visual) values. PacifiCorp generally supports using Visual Resource Management (VRM) tools as described at sections 2.2.6 and 2.7.6 to management visual values within the Price RMP area. Our support, however, is offered within the context that the placement of certain electrical facilities on and surrounding Price RMP lands is both necessary and consistent with the multiple use concepts embodied within the Price RMP. As a general matter, PacifiCorp believes that VRM concepts should accommodate existing and future PacifiCorp electrical facilities within and surrounding the Price RMP area and should not be used to require alternation of existing facilities or a substantial change to existing utility corridors or reasonably foreseeable future facilities. Specific concerns with particular VRM areas are noted in connection with comments related to Lands and Reality	Please see general comment response #139

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		(Utility Corridors) contained elsewhere in our comments.	
PacifiCorp	Wild and Scenic Rivers	W&SR issues have the potential to impact both existing and potential future Water supplies for PacifiCorp's generating and mining facilities. PacifiCorp's Carbon, Huntington and Hunter power plants each use water that originates in the mountains of the Wasatch Plateau located to the west of PFO lands. The headwaters for these water supplies are, in part, on lands administered by the US Forest Service. For the most part, the water is conveyed to the plants via stream segments that cross US Forest Service lands in various locations but also cross state, private and PFO lands. The importance of a firm and steady water supply to power plant operations cannot be overemphasized. Indeed, the ability to generate electricity is directly dependant upon the ability to divert, impound and otherwise utilize water. Based on 7-year averages for one plant, it requires 5,346 acre feet per year to operate one 450 Megawatt unit. If 20% of the water is lost to carrier water, evaporation or system inefficiencies, the amount required to operate that unit will increase to 6,715 AF/yr. If a decision is made to add new generating capacity such as the possibility of adding Hunter Unit 4, then additional water supply capacity must be found in the area of the Hunter Plant. The most recent water rights adjudication in the area of the PFO demonstrates that more water is owned on paper than is physically available for delivery in most years. One of the river systems covered by DRMP is the San Rafael river. Information provided by the Forest Service suggests that average annual water yield is 233,000 acre feet, yet over 308,000 acre feet of paper rights exist. In a given year, approximately 1/3 more paper water rights exist than there is wet water to fill those rights. In over-appropriated systems like this, wise management of this existing limited resource becomes critical. One tool for wise management is impoundment. Indeed, the ability to impound water to aid in controlled management ensures that the water will reach those whose right it is to put that water to beneficial use at the appropriate time. The more water that is impounded throughout the drainage, the more options are open to distribute and beneficially use that water.	Proposed RMP is based on the suitability considerations presented in Appendix C, including reasonably foreseeable uses that would be enhanced or curtailed if the river segments were designated to the Wild and Scenic Rivers System. The concerns expressed in the comment were considered.
PacifiCorp	Wild and Scenic Rivers	PacifiCorp currently relies on several impoundments in the form of reservoirs in providing water supplies to each of its generating plants. In addition, water supplies to the Huntington Plant have been impacted through water losses at the Electric Lake reservoir. Significant efforts to make that water supply firm again are underway. In that regard, PacifiCorp has little choice but to resist any course within the DRMP or elsewhere which could possibly impact our ability to better use limited water resources.	Please see general comment response #151
PacifiCorp	Wild and Scenic Rivers	PacifiCorp will oppose any action which could prevent future necessary impoundments or which could create in-stream flow rights to the detriment of PacifiCorp's current of future generation capacity. For this reason, PacifiCorp would prefer not to see the lower San Rafael river listed as a W&SR if such listing would preclude future impoundment upstream, or if any perceived in-stream flow right would be established by that action.	Proposed RMP is based on suitability considerations presented in Appendix C, which include reasonably foreseeable uses that would be enhanced or curtailed if the river segments were designated to the Wild and Scenic Rivers System. The concerns expressed in the comment were considered. Also see general comment response #86.

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PacifiCorp	Wild and Scenic Rivers	A primary concern to PacifiCorp is Huntington Creek which is the exclusive source of water for PacifiCorp's Huntington Plant. Although the majority of Huntington Creek crosses US Forest Service land, a portion on the creek above the plant actually crosses land within the PFO. The Manti-La Sal Forest has determined that Huntington Creek is eligible for W&SR designation and currently is making a suitability determination which is expected shortly. As best we can tell, none of the DRMP W&SR maps (2-48 through 2-50) show alternatives for W&SR designations that would include Huntington Creek. In addition, PacifiCorp understands, based on information available outside of the DRMP, that the PFO is essentially relying on the Manti-La Sal Forest to make W&SR designation decisions even for those portions of Huntington Creek that actually cross over small portions of PFO land. PacifiCorp does not believe that any portion of Huntington Creek, including those portions that cross PFO land, is suitable for W&SR designation and attaches a copy of our comments submitted to the Forest Service in that regard.	Since such a short distance of Huntington Creek crosses lands administered by the BLM, it would be impractical for the Price Field Office to evaluate the segment independent of the Manti-La Sal. Although the BLM recognizes that Huntington Creek is eligible from the outlet at Electric Lake to the inlet at Huntington Plant, of which only approximately one mile is on BLM lands, the Final EIS does not include any determination on the suitability of Huntington Creek. Instead, the suitability of Huntington Creek will be addressed in the Forest Service planning effort. Until that decision is made, BLM will work cooperatively with the Forest Service to protect the stream's outstandingly remarkable values, free-flowing condition, and tentative classification as actions are proposed on a case-by-case basis.
PacifiCorp	Wild and Scenic Rivers	A primary concern to PacifiCorp is the Price River above PacifiCorp's Carbon Plant. The Price River is the main conveyance of water to this important and historic generating facility located in Carbon County. Map 2-49, Alternative C, shows one portion of the Price River below the Scofield Reservoir and above the Carbon Plant as designated for recreational status and another portion as designated for scenic status. PacifiCorp objects to Alternative C in this regard and to these designations because they have the potential to adversely impact plant operations which may, depending upon future water conditions, require added diversions along the Price River. In addition, PacifiCorp notes that the suitability characteristics for the Price River above the Carbon Plant listed in Appendix 3 do not justify a finding that this portion of the Price River is suitable for W&SR designation. Alternatives A. B and D do not designate any portion of the Price River as W&SR and PacifiCorp supports those alternatives in that regard.	Please see general comment responses #86 and #151
PacifiCorp	Wild and Scenic Rivers	PacifiCorp is concerned about the impact that W&SR designations downstream of its generating facilities may have on water supplies upstream of the designations. The generating plants rely on water supplied by the Price River, Huntington Creek, Cottonwood Creek and Ferron Creek. The Price River eventually flows into the Green River and the other waterways each flow into the San Rafael River which, in turn, flows into the Green River. Under all alternatives, portions of the Green River are designated with W&SR status and under 3 of the alternatives, including the preferred Alternative D, portions of the San Rafael River are designated with W&SR status. PacifiCorp is concerned that these designations downstream of its water supplies may impact its water supplies by: (1) imposing flow requirements upstream in order to meet flow expectations within W&SR segments; (2) establishing junior water rights related to downstream W&SR segments which, as upstream diversion points and priority dates change through normal water rights administration, become more senior in priority and capable of impacting upstream water usage.	Please see general comment responses #86 and #151
PacifiCorp	Wild and Scenic Rivers	PacifiCorp notes that general statements by PFO personnel and BLM W&SR guidance documents indicate that W&SR designations will never impact upstream usage along non-W&SR segments in any way. PacifiCorp agrees that this is the proper legal position and asks that the final Price RMP specifically state that conclusion in the specific context of the watercourses mentioned above and in relation to PacifiCorp's generating facilities.	Please see general comment responses #86 and #151

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Paiute Indian Tribe	Cultural Resources	The concerns that we do have are the Rock Art sites that are visited by people every year also the OHV's that may be destructive around these areas.	Please see general comment response #9
Pocatello Trail Machine Association	OHV Route Identification	Many of our Members have had the opportunity to spend time in your state of Utah riding on the San Rafael and we strongly oppose any additional road and trail closures in the Route Designation Planning for this area!! It is unclear in the DRMP/DEIS what changes are proposed. We need to know how each alternative will alter this travel plan. Concerning the Chimney Rock/Summerville Trail as well as the Arapeen connectors, please clarify your intentions concerning these popular OHV Trail Systems.	With the exception of Alternative E, all of the alternatives analyzed in detail would not change the San Rafael Route Designation Plan. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. Table 2-15 of the Proposed RMP/Final EIS indicates that under the Proposed RMP the Summerville/Chimney Rock Trail System/Arapeen Trails System would be designated open for OHV use.
Pocatello Trail Machine Association	Recreation	Our Club requires plenty of dispersed camping areas to make our outings truly enjoyable not to mention the reduction of impact on the land such dispersion provides. There are no justifications for any limits on dispersed camping. Often family groups meet to enjoy these areas as well as members of small Clubs such as ours. Limits and overly restrictive, difficult to understand "Rules" imposed by many management layers are ridiculous and we are very much opposed to this approach to "land management".	Please see general comment response #81
Public Lands Advocacy	Process and Procedures	Public Lands Advocacy (PLA) is in the process of reviewing the Draft Environmental Impact Statement and Resource Management Plan for the Price Field Office. Given the complexity of the document and the extensive issues that have presented themselves, we have found there are many aspects of the proposal that require added time to digest and evaluate. As a result, the time frame imposed by the BLM is inadequate for sufficient public review and response. Therefore, we respectfully request that the BLM extend the comment period on the draft EIS and Price RMP by 60 days in order to afford the public an opportunity to give the agency comprehensive, high quality comments.	Please see general comment responses #125 and #145
Redtail Aviation	Socioeconomics	In addition to the recreational value, there is a great deal of potential value, just because they exist. These back country airstrips have brought significant revenue to us over the years and sometimes just because they are there. The Peter's Point airstrip meant over $60,000 in revenue to us this year for work we did in support of the Bill Barrett Corporation. Had it not been there, we would not have been able to get the resources together to permit and create a new airstrip for that support.	See general comment responses #21 and#132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses including recreation. This analysis evaluates the economic impacts to local communities in terms of jobs and income related to these uses. A discussion of the analysis is provided in Volume II section 4.6. In addition, the Price BLM is not currently planning on any airstrip closures through this RMP revision process. Any future closure of existing backcountry airstrips would be done only on a case-by-case basis and would adhere to the following provisions. Section 345 of Public Law 106-914 states that the Department of Interior can not permanently close aircraft landing strips, officially recognized by State or Federal aviation officials, without public notice, consultation with cognizant State and Federal aviation officials

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			and the consent of the Federal Aviation Administration. Landing strips damaging soil and water resources or impeding agency compliance with existing laws and/or regulations may be closed following appropriate public notice, consultation and consent. Short-term closures are not affected by this provision.
Redtail Aviation	Transportation and Access	There are many other airstrips in the RMP area that continue to have use as recreational locations, camping, flight training, etc. They are identified by the Topo maps and the Utah Back County Pilots Association's Database. These strips are a valuable asset to our area and need to be recognized as such.	Please see general comment response #21
Redtail Aviation	Transportation and Access	Another consideration is safety. We utilize small single engine aircraft and have been developing air tours over the San Rafael Reef and Desolation Canyon over the last couple of years. It is has been a nice benefit that the airstrips we fly over have been utilized by the recreational pilots and have at least had the rocks thrown off and some debris cleaning done by those pilots. In the event of an emergency we have a great deal of confidence that landing on one of those airstrips would not have a catastrophic ending, due to this minimal level of maintenance. The Utah Back Country Pilots Association also posts notices about problems with those airstrips so that we are advised. Without having these airstrips available and somewhat usable the margin of safety of our air tours over the San Rafael and Desolation Canyon will be greatly diminished. We are a small business in Carbon County and as such feel that having these airstrips go away would be severely detrimental to our business. Please consider adding a note to the RMP that acknowledges the existence of these other airstrips so that individual consideration can be given to them as need arises in the future.	Please see general comment response #21
Redtail Aviation	Transportation and Access	There are many other airstrips in the RMP area that continue to have use as recreational locations, camping, flight training, etc. They are identified by the Topo maps and the Utah Back County Pilots Association's Database. These strips are a valuable asset to our area and need to be recognized as such. In other states such as Idaho, these airstrips have been supported and promoted and bring significant revenues to the local economies. In addition to the recreational value, there is a great deal of potential value, just because they exist. These back country airstrips have brought significant revenue to us over the years and sometimes just because they are there.	Please see general comment response #21
Ride with Respect	OHV Route Identification	I am writing on behalf of Ride with Respect, a 501(c)3 dedicated to minimizing impacts and maximizing the quality of multiple-use recreation opportunities surrounding Moab, Utah... We encourage the Price BLM to formulate a final plan that is more heterogeneous, to accommodate the spectrum of opportunities so important to the American public. All of the current alternatives are too homogeneous in one way or another. Alternative A and B provide adequate trails, but excess roads at the expense of non-motorized areas. On the other hand, alternatives C and D provide excess non-motorized areas at the expense of roads, and especially at the expense of motorized trails. The final plan should include virtually all of the motorized trails in alternative A, and some balance of the roads proposed between alternatives A and D... While Ride with Respect does not represent cross-country OHV enthusiasts, we recognize that this type of use should be provided for, even if comprising only 1% of the planning area... Next, semi-primitive motorized recreation should be accommodated by a substantial network of rugged trails... The travel plan should also include sufficient improved and unimproved roads for an auto-touring and four-wheeling experience. However, this certainly does not require designating every road on the Emery County road inventory... The resulting travel plan will utilize the sheer size of the planning area, and	See general comment responses #15, #19 and #20

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		essentially provide "something for everyone"... To make trail sharing successful, the plan should specify agency measures to educate visitors and maintain trails and facilities... If BLM requires permits for non-commercial outings, they should be based on the number of participants (not vehicles), and absolutely not involve parties of less than twenty individuals... non-paved roads that are designated open to the public should also remain open to OHVs... Additionally, existing routes should remain open until the route designation plan is approved and implemented. In conclusion, Ride with Respect encourages BLM to proactively plan for a variety of recreational opportunities in the Price resource area.	
Robert L. Bayless, Producer LLC	Minerals and Energy Resources	Our company is an active lease holder and operator in Utah. We believe that energy development may and should occur with sensitivity to the environment. This development will benefit the citizens of the Price area and Utah in general as well as contributing to the National energy requirements.	Please see general comment response #18
Rubicon Trail Foundation	Alternative Maps	Maps should be consistent with the current practices and show VERY accurately the proposed areas so it is clear to all what is intended.	Please see general comment response #32
Rubicon Trail Foundation	Process and Procedures	Is there a provision for adaptive management in place here and in all the plans? In other words as conditions change, management strategies may not be applicable. Lessening restrictions or tightening restrictions would be necessary.	The Office of Environmental Policy and Compliance (OEPC) issued ESM03-6 providing initial guidance to all Department of the Interior agencies on implementing adaptive management practices in NEPA compliance. The BLM has initiated an effort to develop policies and procedures to integrate adaptive management into the NEPA and land use planning processes. If circumstances and conditions change BLM will maintain, amend or revise it's plans to adapt to the changes.
Rubicon Trail Foundation	Process and Procedures	I feel with continued escalation of OHV use in this country, the management plans being developed are needed to balance the use of the land. Plans under development need to look to the future and plan for more OHV use and try to accommodate increases in use.	Please see general comment response #1
Sage Riders Motorcycle Club	OHV Route Identification	We feel that an "OPEN" designation should be given to all lands within one mile of communities, town, cities, or municipalities. Each community has open space adjacent to it's city limits which has historically and is currently being used as a playground for motorized recreation. We feel that this use should be allowed to continue and therefore an "OPEN" designation is required for this buffer zone around each town. If there is a legitimate conflict in a particular area, then that area could be closed, but only after all efforts of mitigation have failed. The SRMC feels that the Orange, Blue and Green Trails of the Temple Mountain Trail System should be open to ATV (52") use. BLM has designated these as single track motorcycle use only. We feel that designation is inappropriate and should be changed. Also, the Lone Man Trail should be designated as OPEN to all vehicles including full-sized 4 wheel drive. The SRMC also requests that BLM re-open the "Purple Trail". This is a single-track motorcycle trail that provides an important connection loop to the other trails in the Temple Mountain Trail System. It receives a high level of use and we feel enforcement of this closure is nearly impossible. By utilizing this trail as a management tool the BLM would be able to better manage the resources of the area. It is our belief that if BLM continues to close valuable, high use trails that the public will fight back and BLM will have failed in it's attempt to eliminate motorized recreation from such areas. Rather than focus attention on telling the public where they CAN'T go, we suggest that BLM put more effort into directing the motorized users where they CAN go. The purple trail should be used as a management tool and be designated as OPEN to single track motorcycle use... Goal: Re-open campsites inadvertently closed by the San Rafael Travel Plan (SRTP). There were many valuable	See general comment responses #15, #19, #20, #25, #31, #79, #131 and #156. For Wild and Scenic River Inventory a decision regarding free-flowing is subjective in nature. There are no specific requirements concerning minimum flow for an eligible segment. Flows are considered sufficient for eligibility if they sustain or complement the outstandingly remarkable values for which the segment would be designated. Rivers with intermittent flows have been designated into the national system, and rivers representative of desert ecosystems should also be considered for inclusion. Suitability considerations for each eligible stream are fully disclosed in Appendix C of the Proposed RMP/Final EIS.

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		Dispersed Camping spots which were closed by the SRTP. SRMC asks that BLM work with the local governments, individuals and user groups to identify those site that they have enjoyed as Dispersed Camping areas. These areas should then be re-opened by BLM for Dispersed Camping. Goal: Provide a reasonable range of access opportunity to see the back-country by youth, the aging population and the physically handicapped. SRMC asks that BLM work with local governments, local citizens, and users to develop maps that identify Dispersed Campsites and Dispersed Camping areas that can be accessed easily by those with a physical challenge. Where appropriate, facilities should be constructed that are American with Disability Act (ADA) friendly. Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of Dispersed Camping opportunities that fulfill the experience desired by family outings. Travel maps will identify Dispersed Campsites and Dispersed Camping areas that can be used by families and/or large groups. Spurs routes will be designated for motorized access to Dispersed Campsites and other destinations such as scenic overlooks, viewing historic and cultural resources.... It is important that we establish designated roads and trails, signage and maps so that OHV use may continue within the lands managed by PFO. We suggest that BLM and local governments work with the OHV communities to establish trail systems comprised of the most valuable roads and trails. This would be similar to the Arapeen Trail System found on the Manti LaSal National Forest. Following are some of SRMC's concerns and comments on OHV use in the DRMP... concerned that although mentioned in the DRMP, no trail systems are shown on the Preferred Alternative. We feel that because the DRMP lacks a Route Designation Plan (Travel Plan), if we allow the BLM to make land use designations without a Travel Plan, we may lose hundreds of miles of motorized routes. We would like the BLM to open all existing roads and trails until all trail systems can be established. During this process, we suggest no Areas of Critical Concerns "ACEC" and Recreational Opportunity Spectrum - Non Motorized "ROS-NM" be considered until all trail systems are established. We want the BLM to recognize all inventoried roads and trails and we want them to designate the entire inventory as open. When the Travel Plan process begins, we suggest the BLM uses local OHV groups in designing and maintaining motorized trail systems. Trail systems are a very important management tool and have proven successful in other areas such as the Arapeen Trail System, Paiute Trail System and The Great Western Trail. A point of Confusion is that the DRMP mentions trail heads but no trails are designated open through the process of Route Designation. SRMC believes that all designated roads and trails should remain open to OHV, ATV, 4-Wheel Drive and Single track motorcycle use. There are several trail systems that have been submitted to the BLM that were inadvertently left out of the Preferred Alternative. SRMC suggests that the BLM recognize the Chimney Rock/Summerville trail system, Buckmaster Trail System and also the proposed Arapeen San Rafael Trail system... It is very important for the BLM to keep Connecting and Loop roads and trails open. Connecting roads and trails help lessen the impact on the surrounding area... SRMC asks that ALL roads closed by the San Rafael Route Designation Plan of February 2003, and which Emery County has filed RS-2477 claims upon, should be re-opened. This includes, but not limited to the following: Copper Globe, Devil's Canyon, June's Bottom, Link Flat, Picture Flat to Miller's Canyon, Red Hole Draw, Seger's Hole, Short Canyon and two roads closed in the 1991 Resource Management Plan, Mexican Mountain and Swasey's Leap. SRMC would encourage the BLM to provide separate trails for OHV use and Mountain Bikers to prevent problems that may arise when both groups are sharing the trail... Mountain Bikers should have their own trail system... SRMC is TOTALLY opposed to BLM's desire to close roads and trails in Devils Canyon, Hondu Country or the Mussentuchit Badlands area. These roads and trails have been used traditionally for years. There are already thousands of acres of land in WSAs that can provide for solitude and a primitive experience. If we allow the BLM to start closing designated roads and trails for this reason, it would give the BLM the opportunity to close even more roads and trails in the Swell. SRMC believes that designation of any waterway or DRY WASHES as	

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		"Wild, Scenic or Recreational Rivers" would have negative impact on recreation within the PFO area. SRMC asks that NO WILD or Scenic designation be made within the PFO. For example, designation of "Wild & Scenic" for Coal Wash both North and South is not appropriate. There is no value of water that runs through these dry washes nor any of the other dry washes which BLM has wasted time and money to "evaluate for consideration" as Wild and Scenic Rivers. To us, this is yet another example of dishonesty and corruption. To consider a DRY WASH as a potential Wild or Scenic RIVER implies that there is water involved.	
Sage Riders Motorcycle Club	OHV Route Identification	Minimize impacts and conflicts from Dispersed Camping associated with OHV use by both mitigation efforts as well as maximizing the dispersal of OHV staging areas and providing extensive OHV staging areas where it makes sense on the ground.	Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and designated sites. Dispersed and vehicle camping regulations and number of designated sites outside the identified recreation management zones within the San Rafael Swell SRMA will be determined at the time the San Rafael SRMA activity plan is completed. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives analyzed in detail.
Sage Riders Motorcycle Club	Recreation	We feel that the BLM's goal should be to manage Dispersed Camping in an environmentally sustainable manner so that future generations of public land users may enjoy this activity as we have... To accomplish that goal, SRMC suggest that BLM work in close cooperation with the users, local government and State landowners. We understand that land managers have real and significant concerns about dispersed camping. The SRMC asks that you address the legitimate concerns while providing a large and diverse opportunity for all public lands visitors. The SRMC asks that BLM continue to allow dispersed camping on public lands and then mitigate any unacceptable resource impacts. The SRMC feels that the economic needs of the local communities should be managed for. The BLM can help in this area by pursuing the following goals: Goal: Manage Dispersed Camping use on Bureau of Land Management lands that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall forest and rangeland health, vegetation and wildlife... SRMC is opposed to all Special Recreation Permits (SRP). We feel that it will limit the economic and cultural values of dispersed camping within the PFO lands. But we also recognize that the BLM may require SRPs in certain areas. If this is the case, the application process should be made as streamlined as possible (within 72 hours of permit request) so that large groups may be able to camp in appropriate areas. SRMC asks that the BLM involve local individuals, user groups, city officials, state agencies and county governments in identifying (inventorying) and/or developing Dispersed Camping areas and Dispersed Campsites that provide the recreating public with a range of experiences. SRMC asks that the BLM pursue partnerships and grants for developing logical Dispersed Camping management to help mitigate budget constraints. State OHV fund money is a great source of funding for projects that promote motorized use of public lands. SRMC suggests that where compatible with reasonable conservation measures, access to campsites will be maintained through areas offering the opportunity to see wildlife and view scenic vistas. SRMC suggests that Dispersed Campsites and Dispersed Camping areas shall be located to minimize significant damage to soil, watershed, vegetation, wildlife or other resources. SRMC suggests that Dispersed Campsites and Dispersed Camping areas shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats and grazing... Goal: Actively manage Dispersed Camping in order to ensure an extensive opportunity that satisfies the experience desired by a wide range of recreationists while	Please see general comment response #81. The goals and activities suggested in the comment are not planning level decisions but may be addressed in an activity level travel management plan as the RMP is implemented. Also see general comment responses #19, #20 and #132

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		minimizing impacts. SRMC asks that BLM work with local governments, individuals and user groups to develop best practice models for campsite maintenance, management, and development. SRMC suggest that an exhaustive inventory of existing campsites be completed to support sustained management. SRMC feels that a successful Dispersed Camping policy will only come after standardized signing on the ground is implemented throughout land management jurisdictions. SRMC suggests that maps be easily available and contain standardized information concerning proper camping etiquette and certain site specific restrictions. SRMC asks that partnerships be developed with user groups to form "Goodwill Rider Programs" to enhance education, safety, ethics, user sharing, conservation and compliance. SRMC asks that partnerships be created and grants be pursued in order to enhance funding for trail-head facilities, trail maintenance and development, signing and mapping. Again, State of Utah OHV fund money is available for this type of project and should be applied for. SRMC feels that BLM must be honest with the user public and quit trying to use any and every lame excuse that their biased employees come up with in order to close areas. We feel that campsites, when closed for a legitimate reason, should be signed with a statement of such legitimate reason. Monitoring should be implemented to justify the reasons stated. Emphasis should first be given to maintenance, reconstruction, and relocation of campsites before closures are considered. Proper education programs and service programs must be an important focus of all recreation management. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, in order to reduce social conflict, the plan should provide for the education of pedestrian and equestrian users about the availability of areas that meet their recreation opportunity setting both in the Forest as well as on adjacent public lands or National Parks. SRMC feels that the term "user conflict" is simply a tool that greedy and selfish users of public land are willing to use in getting their sympathetic comrades at the BLM to close areas to motorized users. Remember that hikers and equestrian users are not limited to trails or roads. They are allowed to hike or ride anywhere without restrictions... Goal: Enhance public land visitor accountability and responsibility so impacts to resources are minimized, campsites remain clean and fire rings do not proliferate... Goal: Attain sustainable resource goals by using mitigation instead of closure.	
Sage Riders Motorcycle Club	Recreation	SRMC is very concerned that the PFO doesn't currently employ a Recreation Specialist with a personal interest or involvement in motorized recreation. SRMC asks that BLM hire an OHV specialist and other staffers that have an interest in OHV management to properly manage this very popular sport.	Please see general comment response #89
Sage Riders Motorcycle Club	Socioeconomics	SRMC asks that BLM include a socio-economic impact statement to be included in the RMP. The BLM needs to provide this economic data as required by Federal Land Policy Management Act (FLPMA).	See general comment responses #2 and #132
Sage Riders Motorcycle Club	Wild and Scenic Rivers	SRMC believes that designation of any waterway or DRY WASHES as "Wild, Scenic or Recreational Rivers" would have negative impact on recreation within the PFO area. SRMC asks that NO WILD or Scenic designation be made within the PFO. For example, designation of "Wild & Scenic" for Coal Wash both North and South is not appropriate. There is no value of water that runs through these dry washes nor any of the other dry washes which BLM has wasted time and money to "evaluate for consideration" as Wild and Scenic Rivers. To us, this is yet another example of dishonesty and corruption. To consider a DRY WASH as a potential Wild or Scenic RIVER implies that there is water involved..	Where river segments are identified to possess outstandingly remarkable recreational values, recreation would be a resource protected and/or enhanced upon designation of the segment into the national system of Wild and Scenic Rivers. Regardless of whether or not a river segment possesses this value, river management plans must be completed for all designated rivers. Such plans would give careful consideration to the effects, whether beneficial, adverse or both, of designation on recreation.

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			Also, there are no specific requirements concerning minimum flow for an eligible segment. See general comment response #88. Coal Wash as well as North and South Forks of Coal Wash are determined to be intermittent in nature having interrupted flow regimes. They should not be automatically precluded for further consideration as a congressionally designated Wild and Scenic Rivers based solely on its their limited flow. Flows are considered sufficient for eligibility if they sustain or complement the outstandingly remarkable values for which the segment would be designated. Rivers with intermittent flows have been designated into the national system, and rivers representative of desert ecosystems should also be considered for inclusion. Under the Proposed RMP coal wash would not be suitable.
Sage Riders Motorcycle Club	Wilderness	On Page 4-483 under "NON-WILDERNESS LANDS WITH OR LIKELY TO HAVE WILDERNESS CHARACTERISTICS" it states "The presence and noise of OHV use of designated routes in all of the remaining non-WSA lands with wilderness characteristics would have a temporary adverse impact on opportunities for solitude and primitive recreation. Limiting motor vehicles use to designated routes, however, would minimize disturbances of adjacent lands protecting the natural character of these areas." No routes would be designated for OHV travel in Devils Canyon, Hondu Country, and Mussentuchit Badlands, and there would be no impact of OHV travel in these areas.	Section 4.2.11 in the Proposed RMP/Final EIS is an expanded analysis of potential impacts on wilderness characteristics on non-WSA lands. Table 4-7 compares the acreage of the OHV management classes for each of the non-WSA lands with wilderness characteristics and the analysis states the number of non-WSA lands with wilderness characteristics areas that would be affected by OHV use. Also see general comment responses #12, and #19.
San Juan Public Entry and Access Rights Association (SPEAR)	OHV Route Identification	SPEAR's (San Juan Public Entry and Access Rights Association) board of directors, elected officials, and general membership have wholeheartedly tried to read and understand your draft Resource Management Plan and Environmental Impact Statement and we are in consensus that it is impossible and you have succeeded in confusing and belittling the public that has entrusted you to manage public land, not restrict its use. Our questions are: 1.Have you ever sat down with the county planners, city managers, and public land users' organizations to ask for input and their concerns that have a direct effect on the social and economic factors in this area?; 2.How can you limit size of group to 25 with 10 vehicles? This is impossible when using ATV's, snowmobiles, motorcycles, bicyclists, horseback riders, etc... It would be impossible to dictate who can go, what size of group can attend, etc... How can you require 180 days advance notification on spontaneous user groups coming?... How can you close roads and trails without due process from users?.. What is your definition of a Buffer Zone? This term has been used by the Sierra environmentalist organization and others to restrict land use to other land users, and it seems the BLM has adopted the environmentalist point of view... In closing, SPEAR feels that your draft RMP/EIS should be amended and clarified so that ordinary people can read and understand its content and intent.	See general comment responses #68, #81, #93, #98,#123, and #145
San Rafael Ranch	ACEC	I also am opposed to the idea of changing the Swaseys Cabin ACEC area to a designated camp site, because I	Please see general comment responses #30, #82

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		feel it would greatly distract from its historical aesthetics. The grazing permittees have already sacrificed the acreage that the ACEC is on and do not feel it is fair to continue to loose grazing without compensation for the changing use.	and #83
San Rafael Ranch	Wild and Scenic Rivers	As a livestock grazing permit holder, I strongly oppose any alternative, including the whole Coal Wash area which designates as suitable for wild and scenic rivers. I also feel this designation would adversely affect my grazing plans.	A determination that a stream is suitable would not affect opportunities for livestock grazing. In such a case, grazing would be managed according to the Resource Management Plan. However, if Congress were to designate a stream, the BLM must evaluate pre-existing uses of the stream corridor to determine whether such uses are diminishing the values for which the stream is designated. Grazing and other uses can continue as long as they are consistent with protecting and enhancing river values. If these activities are determined to be inconsistent, then changes in livestock grazing or other uses may be required. Coal Wash would not be suitable under the Proposed RMP.
San Rafael Subgroup	Recreation	In Chapter 2-Alternatives, 2.3 Resource Uses, Section 2.8.3 Recreation: The language of Alternatives A-D contains very specific numbers and thresholds for management including limitation of numbers and types of use. For example, on page 2-79, the preferred Alternative provides detailed information for developing Temple Mt. as a high use area. Another example, on page 2-75, considers group campsite sizes which are specified in each of the Alternatives. Restrictive language in the DRMP has the potential to limit management in the future as eliminating any references to specific numbers, sizes, etc.., from the alternatives and maintain a more general approach, which complements an adaptive approach to management. We believe that specific thresholds and numbers, sizes, etc. are better left to activity level planning efforts. The Wedge Overlook is one of the most highly visited areas in the San Rafael Swell. Yet this area also contains fragile resources, including special status species Pedocactus despainii. In reviewing the Alternative A-D on page 2-80, the language restricts the Wedge Overlook to day use. The alternatives, as written do not support a balanced spectrum of recreational activity/use. In keeping with the BLM's management goals to seek balance between resource protection and resource use, we strongly recommend that language be included (in at least one of the alternatives) addressing the protection of resources while accommodating overnight use. High use areas in general: The plan is inconsistent in high uses areas with regard to Recreation Opportunity Spectrum (ROS)classes. For example, on page 2-78, Alternatives A,B, and D recommend Sid's Mountain to be included as one of the 'High Use Areas', yet much of Sid's Mountain is considered 'primitive' in the ROS (map reference 2-17 through 2-25). In order to maintain a primitive nature, it would be inappropriate to develop Sid's Mountain in the manner described for other high use areas. We recommend a re-examination of this classification system with regard to high use areas to ensure that management goals are consistent throughout	See general comment responses #50, #65 and #81. Future management options can be accomplished through regular plan maintenance and through activity/implementation level planning. Issues related to site-specific planning decisions are being deferred to activity level planning and implementation, which will be completed for areas such as SRMAs and developed recreation sites after the completion of this plan. Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and designated sites. Dispersed and vehicle camping regulations and number of designated sites outside the identified recreation management zones within the San Rafael Swell SRMA will be determined at the time the San Rafael SRMA activity plan is completed. The text of the proposed RMP with respect to the requirement for organized group SRPs has been changed. All organized groups of more than 14/24 people within a WSA/outside WSAs (respectively) would be required to contact the BLM. The text has been changed in the Proposed RMP/Final EIS to reflect Sids Mountain and Mexican Mountain as "recreation management zones" rather than high

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		the plan.	use areas.
Scientific Geochemical Services	Minerals and Energy Resources	Based upon my experience in oil and gas development and particularly in the field of CBNG operations and after reviewing the Price DRMP and DEIS, I am concerned that the analysis (or lack thereof) presented fall short with respect to numerous critical environmental impacts associated with CBNG extraction. In the BLM letter transmitting the DRMP and DEIS document for review and comment, the statement is made that "This RMP combines two older land use plans (the Price River Resource Area Management Framework Plan) into a single unified Price Field Office RMP." I have reviewed these older plans and they offer little to no relevant discussions with respect to CBNG related impacts resulting from CBNG operations in other western areas that are pertinent for the BLM to consider thoroughly in the Price RMP. My comments are restricted to geological, geochemical, and hydrological impacts caused by CBNG exploitation that need to be thoroughly addressed. Groundwater Impacts: On page 3-53 of the RMP (BLM 2004), the BLM discusses the likely potential of CBNG development in parts of the Price planning area within the next 15 years. CBNG development requires the drilling of wells into the coal seam or seams and withdrawing (pumping) the water from the coal in order to liberate gas (CBNG [methane]). The removal of the water (produced water) creates two sets of impacts, i.e., surface and subsurface. Without delving into too much detain and since these issues are addressed in numerous other recent BLM documents discussing impacts associated with CBNG developments, the Price RMP should consider addressing such surface groundwater impacts like: Produced Water Quality: How the produced water affects surface waters, surface irrigation, wildlife habitat, surface ownership, wetlands, livestock, etc. The chemical composition of CBNG produced water varies from basin to basin as well as within the same basin. The quality of the water determines its use. Some CBNG produced water can be discharged directly to the surface without environmental concern while other water may be reinjected into the subsurface or requires treatment to meet regulatory surface discharge standards. A vast array of treatment options exists that are dependent on the quality and quantity of produced water to be treated. The BLM should investigate the CBNG water quality and discuss discharge options. Produced Water Quantity: What effects do removing and dumping produced water have on erosion, habitat creation and/or destruction, recreation, surface subsidence, cultural and paleontological resources, land value and realty, etc. Again, the quantity of CBNG discharge water has been addressed in numerous BLM and other scientific publications. The Price RMP should adequately investigate this issue and discuss discharge water impacts. Springs: In the Price RMP 4-34 the BLM states under the heading of Protection of Water Quality in Natural Springs "Natural Springs are a scarce resource in the PFO area, and they are critical components for rangeland health and wildlife populations". As stated in Table S-2, when discussing the Summary of Effects of CBNG development, "Flowing artesian wells and springs that emanate from coals in this area are likely to experience a decrease in flow rate". Many springs and seeps sourced from aquifers other than the coal have also "gone dry" in a large portion of the Powder River Basin of Wyoming where CBNG operations have removed hundreds of millions of gallons of water from coal seams. It is now apparent that the dewatering is not restricted to the coal but due to stratigraphic and geologic conditions, geologic formations above and below the coal can also be dewatered. The BLM must take a critical review of how CBNG dewatering operations can affect the natural springs in the planning area. Wells: In a similar situation as springs, wells (domestic, industrial, municipal or others) completed in or above the coal can feel the effects of CBNG dewatering and either experience a lowering of water head or go completely dry. The potential for similar losses of water in wells within the Price planning area is high with CBNG operations and deserves adequate investigations by the BLM. Aquifer Recharge: The BLM must take a serious look at the effects of CBNG operations have on aquifer recharge. It has already been established that depletion of water volumes	A specific and detailed analysis of environmental impacts from coalbed natural gas extraction has been done in the Castle Gate, Price and Ferron Coal Bed Methane EISs. Any future proposals for development of coal bed methane would require additional NEPA analysis. Also see general comment response #72.

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		within the coal or sands above can and does occur. Interestingly, even though the BLM sates aquifer recharge may take 100 years or so there is no discussion of similar water loss and recharge rate in the Price planning document. The overall impacts to the groundwater and surface as a result of the groundwater discharge have not been fully or accurately analyzed or disclosed... The withdrawal of water (and subsequent depressurizing) from the coal aquifer can cover a huge area. Also, the BLM state, "Methane migration potentially could occur at widespread locations within the PRB, as methane can migrate long distances along naturally occurring joints and fractures in rocks"(BLM 1999a). The BLM 3-44 (2002) again states that the potential for methane migration within the Powder River Basin is not limited to areas containing near surface coal seems and that methane migration could occur at widespread locations over the basin. The BLM has identified an entire basin in Wyoming as well as huge parts of the San Juan Basin of Colorado and New Mexico (BLM 1999b) as areas of potential methane seepage and need to adequately address this risk related to CBNG development in the Price area. Recently, the Colorado Oil and Gas Conservation Commission undertook a study (McLaren and Richards, 2001) to identify the existing historical methane seeps, and to the extent possible, identify conditions prior to CBNG development. As stated in that report, "Any activity that penetrates the overburden above the coal beds or removes water from the coal beds, weather natural occurring or due to activities by man, has the potential to cause the release of methane". This statement indicates the potential for CBNG activities to induce methane seepage to the surface where it may become a hazard. The BLM should consider such a study in the Price area prior to CBNG development. The area of the Price planning area potentially affected by the CBNG development contains numerous conventional oil and gas wells. Many of these wells penetrate (are deeper than) the CBNG coals. It is possible that a combination of time and the subsurface conditions (corrosion, rust, pipe fatigue, etc.) have caused many of these wells (abandoned or working) to have case problems. Cross contamination of reservoir fluids (including methane) along these vertical conduits can become a significant problem. With the number of pre existing wells penetrating the coal, many possibilities exist for methane seepage to occur transcending the entire geologic column from the coal to the surface. I feel the BLM has to study the potential problems associated with the issue. Again, as stated by the BLM, "Gas migration, seepage, and venting are naturally occurring processes where coal beds are extremely close to the surface, and can be enhanced during CBNG development activities" (BLM 2002). In the San Juan Basin of Colorado, Amoco Oil Company's CBNG operations enhanced methane venting to levels sever enough to cause the evacuation of homes/ranches (BLM 1999b), kill 100 year old trees and other vegetation (Stonebrooke, 1996), kill burrowing rodents, and otherwise create an area several mile long and thousands of feet wide unsafe for habitation (Stonebrooke and BLM 1999b). The BLM (RMP 2004) fails to recognize and to address adverse impacts that are being felt by ongoing CBNG development in other areas (as reported by BLM offices), and need to incorporate these impacts in the Price RMP. Additionally, the outlook for methane seepage impacts will only get worse. Recently, the Colorado Oil and Gas Conservation Commission stated that new work has shown that methane seepage at the outcrop as a result of coal dewatering in the San Juan Basin will significantly increase (4 to 20 fold increase). The BLM (RMP 2004) needs to adequately investigate methane seepage issues. Global warming is an intriguing topic that has been debated throughout the scientific community. The possibility of the temperature changes being a totally natural event has merit; however, a preponderance of scientific information suggests human activity (industrial pollution, auto emissions, etc.) has caused or accelerated the climate changes by adding greenhouse gases to the atmosphere. Most debate centers on carbon dioxide (Co2) as the major greenhouse gas. Methane is 20 times a more effective greenhouse than CO2^3. The venting of methane during CBGN well completion procedures is one source of additional methane to the atmosphere. Given the amount of potential methane seepage/venting to the atmosphere (other than well testing) caused by CBNG development, I feel it imperative the BLM investigate the issue more thoroughly. The	

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		BLM (RMP 2004) fails to confront one of the most potentially disastrous issues related to CBNG development, i.e., coal fires. The BLM (2002) states, "CBNG development is not likely to increase the occurrence of underground coal fires in the Project Area". The BLM (2002) discusses the unlikely nature of coal fires increasing (or starting) by implying the completion of CBNG wells created unfavorable conditions for the spontaneous combustion of coal. This may be true for the coal in the deeper portions of basins (Lyman and Volkmer 2001), but the possibility of coal fires at the edges of the basin where the coal is shallowest and dewatering of the coal is quite acute (BLM 1999a). The BLM (RMP 2004) needs to investigate the CBNG potential impact. Mr Johnson, the Price DRMP and DEIS do not adequately address the potential impacts to the planning area from the upcoming CBNG activities.	
Sheri Griffith Expeditions	Recreation	Sheri Griffith Expeditions and staff feel that alternative D (the preferred) is not a justified alternative regarding motors in desolation/gray canyons. Sheri Griffith Expeditions has been taking the public through deso/gray for 25 years with motors and oar trips. Through this extensive experience we have learned the following: Eliminating motors from trips over 5000cfs would limit the type of trips we offer. We do trips for elderly and disability groups that require motors for safety and comforts. The requirement of four stoke motors is both short sighted and expensive. There are newer two stroke motors that are just as efficient and clean as four strokes. A properly tuned two stroke can be clean as most four strokes that people are running. The 90 trip allotment for motors is confusing and unclear. Who would get these special permits? Are the private apart of this? There are two many unanswered questions. Motors can be extremely useful in low water and with alternative type trips. Motors can help the quality of trips on the water. In low water years this 90 trips will be used up very early and will lower the overall quality of trip for guest that come later in the year. Sheri Griffith Expeditions is extremely against Alternative D as far as motor use in desolation/gray. SGE is for the current management plan as far motor use.	Please see general comment response #34
Sheri Griffith Expeditions	Recreation	Sheri Griffith Expeditions and staff are strongly opposed to the alternative 'D' concerning the limiting of motorized use in the Desolation/Gray Canyons... The ban on motorized travel on the Green River when the flow is over 5000 CFS would hinder the public's access to the river by excluding people with shorter vacation time frames and special populations needing additional equipment... The ban of motors at this high level could also cause a safety problem... The move to 4 stroke motors is very limited and expensive requirement. Many new 2 stroke motors are very efficient and more environmentally friendly than 4 stroke motors. Even current 2 strokes if tuned correctly can be very environmentally friendly. The EPA is mitigating the expense and effects of changing to 4-stroke motors by phasing out the manufacture of 2-stroke motors over a number of years while allowing the use of existing 2 stroke motors. This seems to be a wiser and more fair alternative. The limit of 90 motor trips a year is very confusing and subjective. This alternative is not very clear, nor do the effects and consequences seem thought out. Does the 90 trips include private motor use? Which companies will get these uses? Why is the set at 90? More data is needed before any number limits are put into effect. All the current BLM alternatives do not seem to address any historic problems. Instead, they seem to be aimed at the public that does not have the time, abilities, or equipment to enjoy Desolation and Grey Canyons. this is the very public Sheri Griffith Expeditions and other outfitters are here to serve. It is for these reasons Sheri Griffith Expeditions prefers the 'no action alternative' concerning motorized use on the Green River.	Please see general comment response #34
Snake River Trail	Alternative Maps	The public will not stand for this kind of deception including the popular Chimney Rock/Summerville trail system	Please see general comment responses #20 and

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Machine Riders Association		on the Preferred Alternative. Maps must be updated to accurately portray OHV designations outlined in each alternative. For example, how many miles of roads and trails will be open or closed for OHV use on map 2-56? The BLM has proposed many overlapping management layers in San Rafael Swell. Each layer brings with it management restrictions, yet these restrictions are not drawn along any recognizable geographic boundary making compliance virtually impractical. The recreating public will not tolerate restrictions which are impossible to understand.	#31
Snake River Trail Machine Riders Association	OHV Route Identification	The BLM is proposing severe group size limits. Group size limits put organized clubs and large families under unfair restrictions. There is no justification of group size limits proposed in any of the alternatives. The BLM should stick with the current guidelines of a 50 vehicle limit.	Please see general comment response #81
Snake River Trail Machine Riders Association	OHV Route Identification	The BLM says the San Rafael Route Designation Plan will be in the new management plan but does not tell the public that other management layers will cause significant road closures. With proper supervision riding causes little impact to the environment. Forcing groups to ride and camp in small designated areas causes more environmental impact than spreading the groups over larger areas. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Plan.	Please see general comment responses #20 and #37
Snake River Trail Machine Riders Association	OHV Route Identification	As a trail machine (OHV) club for 40 years with a membership of 54, we enjoy riding as family and friends on many occasions. The reason we have an organized club is to promote safety, environmental care (i.e. littering) and riding etiquette. We are available for search and rescue missions, trail maintenance and public projects. The BLM is proposing severe group size limits. Group size limits put organized clubs and large families under unfair restrictions. There is no justification of group size limits proposed in any of the alternatives. The BLM should stick with the current guidelines of a 50 vehicle limit	Please see general comment response #81
Snake River Trail Machine Riders Association	OHV Route Identification	The BLM says the San Rafael Route Designation Plan will be in the new management plan but does not tell the public that other management layers will cause significant road closures. With proper supervision riding causes little impact to the environment. Forcing groups to ride and camp in small designated areas causes more environmental impact than spreading the groups over larger areas. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Plan.	Please see general comment response #20
Snake River Trail Machine Riders Association	Process and Procedures	The BLM has proposed many overlapping management layers in San Rafael Swell. Each layer brings with it management restrictions, yet these restrictions are not drawn along any recognizable geographic boundary making compliance virtually impractical. The recreating public will not tolerate restrictions which are impossible to understand. The complexities of the proposed plans are confusing therefore public compliance exceptions are unrealistic.	Please see general comment response #37
Snake River Trail Machine Riders Association	Transportation and Access	The complexities of the proposed plans are confusing therefore public compliance exceptions are unrealistic. Popular OHV trail systems should remain open. We would encourage a realistic plan to keep roads, trials and camping open for proper use by all recreational groups.	Please see general comment responses #10 and #20
Southeast Utah Association of Local	ACEC	The board is concerned that there is an over-reliance in the Moab and Price RMPs upon ACEC designations to the detriment of conventional multiple use management and also that this mode of management is being employed in a manner inconsistent with the clear meaning and intent of the statute. It is noted that some	BLM agrees that recreation values are not relevant and important values for ACEC designation. In the Proposed RMP/Final EIS reference to recreation

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Governments		alternatives for some proposed ACECs cite enhancement of recreational opportunities as a benefit of ACEC designation. In some instances, that recreational opportunity which is benefited is "primitive recreation", e.g. in the Price RMP, Lower Green River, Temple-Cottonwood Dugout Wash ACECs. In other instances the type of recreation benefited is "disbursed, non-motorized," e.g. Range Creek. In other instances, an ACEC is proposed in part on the basis of enhancing "recreation opportunities" generally without specification as to type. Our reading of CFR Title 43 section 1610.7-2 and section 1702 (a) does not suggest that ACECs were intended to be established for the enhancement of recreation. Indeed, the statute neither expresses nor implies, that ACEC designation may be used to lend management preference to one use of the land over another. Our reading of the code does suggest that ACEC designation is intended to "prevent irreparable damage" to certain enumerated values and natural systems or processes. We are aware that BLM has been accused of using ACECs as means of reestablishing wilderness inventory areas which were eliminated under an agreement between the State of Utah and the Department of Interior. Insofar as ACECs are proposed, either in part or in whole, for the furtherance of primitive or disbursed, non-motorized recreation, we believe that the charge has merit. To the extent that this charge is merited BLM may be acting in a manner abusive of its statutory discretion.	values and opportunities have been removed from potential ACEC descriptions. The analysis then describes the impacts of ACEC management on recreation and other resources and uses.
Southeast Utah Association of Local Governments	ACEC	We have noted that grazing and surface occupancy for mineral extraction are slated for elimination under some alternatives for some proposed ACECs. Neither grazing nor surface occupancy for oil and/or gas exploration or extraction necessarily results in "irreparable damage." Grazing is well understood to be a use based upon renewable resources. By definition, under proper management, grazing does not result in "irreparable damage." We can see neither resource justification nor statutory authority for the elimination of grazing from an ACEC merely on the basis of its having been so designated. We are also aware that the effects of mining and oil and gas activities are reparable. Entire coal mines and coal communities have been reclaimed in the southeastern region to the extent that even those who knew them cannot tell where they once were. BLM is well practiced in requiring reclamation and restoration of disturbed areas. We, therefore, do not accept that surface occupancy for exploration or production of minerals, oil and/or gas necessarily results in "irreparable damage." This being the case, and given that the standard for ACEC designation is the prevention of "irreparable damage", we cannot accept that either grazing or mineral or energy extraction can be precluded forthwith from any designated ACEC absent a showing of "irreparable damage" to a statutorily listed value or process and this showing to be made on a case-by-case basis. It is improper, in our opinion, to conclude in advance that these and other, similar activities of man will be foregone as a matter of course simply because an area has been designated as an ACEC. Section 1610.7.2 of the CFR is not license for summary exclusion from the land of any class of activities such as grazing or mineral or energy production. Stated otherwise, this statute is not an authority to extinguish activities which some might find merely objectionable or inconvenient within the context of the values identified in a proposed ACEC. Rather, the statue merely provides authority to employ extraordinary measures as necessary, on a case-by-case basis, to assure that certain identified values and natural processes are not "irreparably damage(d)." The standard thus set by the law is not mere damage but damage that is "irreparable." Our view of the meaning of this standard, based upon a plain and unaffected reading of the entire statute, is that a historic, cultural, or scenic value or natural or cultural feature or process would be damaged for all time but for supplemental protection afforded by ACEC designation. The adjective "irreparable" is defined by "Webster's Encyclopedic Dictionary of the English Language" as follows: (damage) that cannot be repaired, remedied, retrieved etc., an irreparable loss. BLM must interpret this word in accord with this definition since no alternative construction is either expressed or implied by either the text of the tenor of the statute wherein it is used: "It is a cardinal principle of statutory construction that a court's interpretation of a statute begins with the plain meaning of the statute's words," Bates v Runyuon, No 95-5183, 1996 WL 532201, at *2, 10th Cir. Sept. 19 1996. "(W)here the words of a law, treaty, or	Please see general comment response #153

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		contract, have a plain and obvious meaning, all construction, in hostility with such meaning, is excluded. This is a maxim of law, and a dictate of common sense; for were a different rule to be admitted, no man, however cautious and intelligent, could safely estimate the extent of his engagements, or rest upon his own understanding of a law, until a judicial construction of those instruments had been obtained," Green V. Biddle, 21 US 1, 1821. Construction of the word "irreparable" for purpose of BLM RMPs to mean anything other than that which is its natural and customary meaning, as stated above, would be an arbitrary and possibly actionable abuse of discretion. It is the recommendation of this Association that BLM employ its authority under section 1610.7-2 as intended. That is, BLM must avoid use of its authority under this section for the purpose of favoring one activity upon the land over another. Summary discrimination among the possible uses of the land is neither the purpose nor the intent of the statute. While certain uses of the land may be benefited as a consequence of ACEC protection of a listed value or natural system of process, this benefit is a secondary consequence of ACEC designation and not its primary object. Prevention of "irreparable damage" is the sole object of the statute. Use of the statute for objects to intended is usurpation of undelegated authority or power. The exercise of undelegated power is at best arrogance and at worst tyranny: (Tyranny is) "the exercise of power beyond right, which nobody can have a right to do," John Locke, from The Great Ideas, pg 878. It is also the recommendation of this Association that BLM not succumb to the temptation to redefine any word in section 1610.7-2 to suit ulterior motives or purposes, or to create restrictions upon land use beyond those which are intended by the law giver. Pursuant to the ACEC designation historic uses may be considered for further regulation only upon a showing that their employment on the land will result in "irreparable damage" to a value or process as set forth in section 1610.7-2. This association also recommends that BLM recognize that temporary intrusions or recoverable traces upon the land do not constitute "irreparable damage." BLM has, perhaps unwittingly, established the general parameters of a standard for ascertaining whether a given activity will result in "irreparable damage." BLM has proposed wilderness designation in areas that have been chained or which have been roaded or which have seen the erection of structures. Justification for wilderness designation in these areas has been based, in part, on grounds that these traces of man are "naturally reclaiming themselves" or that structures may be removed. Thus, we remind BLM that by its own standard neither a road nor a chaining nor a temporary structure may necessarily constitute "irreparable damage." We do expect BLM to be consistent and not unjustly arbitrary in its judgments and in application of its statutory authorities.	
SouthEastern OHV Club	Process and Procedures	The DRMP does not follow the Federal Land Policy and Management Act (FLPMA) at 43 USC 1712(a) and 1732(a), which mandates that public lands must be managed under the principles of multiple use and sustained yield. Section 1712(c)(9) mandates when developing and revising the Price RMP: (1)keep the Price RMP consistent with State and local plans to the maximum extent possible and (2)keep the Price RMP consistent with Federal Law and the purposes of FLPMA. Through alternative "layers" (ACECs, SRMAs, high use areas, designated camping areas, RO's) multiple use is non-existent.	Please see general comment responses #1, #29 and #37
SouthEastern OHV Club	Process and Procedures	The SEUOHV Club cannot support any of the Alternatives and suggest the BLM look at issuing a Supplemental DRMP and DEIS to correct all the rhetoric and inconsistencies that misinform the public!	Please see general comment response #143
SouthEastern OHV Club	Recreation	Dispersed camping is important to our members and their families. We recommend BLM stay with the proven 50 vehicle group size limit. Size limits in all of the alternatives subjects small to mid-sized non-profit recreational groups to unreasonable regulations.	Please see general comment response #81
Southern Utah Wilderness Alliance	ACEC	The Draft RMP fails to comply with its FLMPA and NEPA responsibilities in its consideration and analysis of areas of critical environmental concern (ACECs).	Please see general comment responses #126. #152 and #155

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Southern Utah Wilderness Alliance	ACEC	BLM's consideration of ACECs was inadequate: In the Draft RMP, BLM's only treatment of ACEC nominations is in Appendix 26. The appendix mentions briefly that SUWA nominated 23 ACECs, and then says that the 10 areas that were brought forward for consideration are discussed below. There is no further mention of the ACECs that were dropped. Furthermore, SUWA was never notified of the decisions regarding our ACEC nominations. BLM must comply with specific responsibilities when it drops ACECs from further consideration.	Please see general comment response #126
Southern Utah Wilderness Alliance	ACEC	BLM never notified SUWA of the agency's determination that its ACEC nominations would not be considered further.	The BLM failed to notify nominees concerning determinations on ACECs nominated during preparation of the Draft RMP/EIS. On December 13, 2005 BLM issued a supplement to the Price Draft RMP/EIS to "List Proposed Areas of Critical Environmental Concern and Specific Associated Resource Use Limitations for Public Lands in Carbon and Emery Counties, Utah." A 60-day comment period was offered. The ACEC evaluations in Appendix L of the Proposed RMP/Final EIS include an evaluation of the SUWA nominated ACECs. Also see general comment response #126.
Southern Utah Wilderness Alliance	ACEC	A review of BLM's documentation reveals that the agency fails to provide adequate rationale for the disqualification of, in whole or in part, several nominated ACECs. BLM provides no explanation for these actions. This lack of written record and rationale is also in direct violation of BLM's manual, §1613. 33.	Please see general comment response #126
Southern Utah Wilderness Alliance	ACEC	BLM's failure to provide notice of, and rationale for, its decision to drop several nominated ACECs from consideration is in clear violation of the law. Furthermore, BLM's presentation of the need for special management protections is misleading. According to BLM manual, §1613.11-12, the determination of need for special management prescriptions should be presented separate from the relevance and importance determinations, and should contain specific rationale for the decision made. BLM must provide a detailed written rationale for its rejection of each nominated ACEC for review and comment during the RMP revision process, prior to release of the final RMP.	Please see general comment response #126
Southern Utah Wilderness Alliance	ACEC	Although BLM has the clear obligation and authority to designate ACECs in order to protect special environmental values throughout the Price Resource Area, the Draft RMP fails to designate ACECs over many lands that are in need of such protection, and fails to provide adequate special management protections for those ACECs that it does propose to designate. Thus, the Draft RMP falls far short of offering any meaningful protection for the values the ACEC designations are intended to protect.	Please see general comment response #30
Southern Utah Wilderness Alliance	ACEC	ACECs that were rejected are not otherwise adequately protected: In many instances, BLM's rationale for rejecting an ACEC nomination is that the resource values present in the unit are adequately protected by existing laws or policies. SUWA refutes this rationale, as other information presented in BLM's alternative discloses that conflicting resource uses are permitted within these areas.	An area where conflicting uses are allowed does not necessarily justify designation and management associated with an ACEC. If relevant and important values are not threatened by other uses an ACEC designation and management would not be necessary. If relevant and important values are adequately protected by other special management designations (WSA, NHL etc.) or if they are not threatened, then special management

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			as an ACEC is not required. The nature of the threat is not a criterion for ACEC designation.
Southern Utah Wilderness Alliance	ACEC	FLPMA mandates that BLM shall give priority to the designation of ACECs. However, although BLM agreed that several of the nominated ACECs met the required criteria, the agency did not propose their designation. Also, it is apparent that the BLM gave priority to conflicting resource uses over the designation of ACECs. In the preferred alternative, there are 522,000 acres of ACECs - 171,000 fewer acres than in the conservation alternative, and 61,000 fewer acres than in Alternative B. From conversations with BLM staff, it is SUWA's understanding that Alternative B is the "split the difference" alternative, where management decisions about halfway between Alternatives A and C are proposed. Unfortunately, given the figures above, it is plain that BLM management arbitrarily concluded that another land use consideration took priority over the designation of ACECs. This is contrary to one of FLPMA's first dictates on ACEC designation. BLM must reconsider its rejection of numerous nominated ACECs in light of FLPMA's direction to prioritize ACEC designation. Regardless, the BLM must fully consider and adequately address the ACECs nominated by SUWA and presented in the CCHP.	Please see general comment response #158
Southern Utah Wilderness Alliance	Air	The Draft RMP's consideration and analysis of air quality is not adequate under the law. SUWA incorporates by reference the comments submitted by Vicki Stamper of Laramie, Wyoming, concerning these critical issues.	See response to specific comments # 3546 and #3547
Southern Utah Wilderness Alliance	Cultural Resources	The Draft RMP's consideration and analysis of cultural resources is not adequate under the law. SUWA incorporates by reference the comments submitted by Carol S. DeFrancia of Moab, Utah concerning these critical issues.	Please see general comment response #9
Southern Utah Wilderness Alliance	Minerals and Energy Resources	The Draft RMP is flawed; SUWA supports the Castle Country Heritage Plan: The Draft RMP's consideration of oil and gas development and its impact on other resource values is contradictory, inadequate and myopic. While the document recognizes that "[m]inerals and energy activity presents the greatest potential for significant impacts in the area" (Draft RMP at 4.2.2), every alternative, including the BLM preferred alternative D, sacrifices world-class scenery, recreation and wilderness in order to develop oil and gas deposits -- the presence of which is speculative at best. In order to comply with FLPMA, NEPA and other laws and regulations, the Price RMP must provide for a balanced approach to oil and gas leasing and development that both provides for economically feasible extraction in areas where other important resource values are not dominant.	Please see general comment responses #18, #35 and #101
Southern Utah Wilderness Alliance	Minerals and Energy Resources	The Draft RMP fails to consider fully and adequately a balanced approach to oil and gas development that would fulfill the recognized need to accommodate the public's increasing sensitivity to development within currently natural landscapes, especially those of wilderness quality. Indeed, the Draft RMP hardly represents a step forward, let alone a significant advancement in the protection of such lands. Rather, it plays an elusive game, shuffling tracts of land from one pro-development category to another, and tacking on labels that are nothing more than euphemisms for protection: the "protective" language is entirely discretionary, the avoidance of which does not allow for public review. Further, the cumulative impact of oil and gas related developments, added to impacts caused by other public lands uses, are not adequately analyzed in the Draft RMP.	Please see general comment responses #2, #18. #36, #101 and #123. Implementation of the RMP is subject to the requirements of the National Environmental Policy Act and public review.
Southern Utah Wilderness Alliance	Minerals and Energy Resources	The Draft RMP almost entirely fails to protect any lands from oil and gas development that were not already protected under the current, outdated management plans. Despite the fact BLM-recognized wilderness character lands have nearly tripled in acreage from the existing WSAs, the Draft RMP fails to reflect these changes in acres closed to leasing and development. In other words, the BLM fails to protect 98% of wilderness quality lands, outside of already-protected WSAs, from oil and gas leasing, seismic exploration, and drilling.	Please see general comment responses #18 and #36
Southern Utah Wilderness Alliance	Minerals and Energy Resources	Oil and gas inventory, exploration, drilling and other development activities are not appropriate in proposed wilderness areas, ACECs, and important wildlife habitat. This RMP must reflect the changing resource values in	Please see general comment responses #18, #36 and #101

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		this area, emphasizing the increasing importance of unfragmented wildlife habitat, clean water sources, clean air, and primitive recreation opportunities. Oil and gas development often directly conflicts with these values.	
Southern Utah Wilderness Alliance	Minerals and Energy Resources	Discretionary language does not adequately protect sensitive lands: BLM's preferred alternative closes 584,128 acres to oil and gas leasing and development, and leaves 1,183,476 acres open with no special protections. In addition to the fact that the BLM plan would leave far too many acres of lands open, because of discretionary language the public has no assurance that certain resources would be protected on the remaining 723,641 (574,335 subject to minor constraints; 149,306 open with no surface occupancy (NSO)) acres of public lands. The vast majority of oil and gas stipulations (set out in Appendix 16 of the Draft RMP) are subject to exception (one-time exemption) and modification (temporary or permanent change to restrictions), with many stipulations also subject to complete waiver (permanent exemption), based on very subjective criteria.	Please see general comment responses #18, #41 and #101
Southern Utah Wilderness Alliance	Minerals and Energy Resources	Besides being inadequate, in order for stipulations to ensure any meaningful protection they must be non-discretionary - not open to the subjective interpretation of the management team in place at any given time, and without the opportunity for public review.	Stipulations could be excepted, modified, or waived by the authorized officer only through application of the exception, modification, and waiver criteria identified in Appendix G of the Proposed RMP/Final EIS.
Southern Utah Wilderness Alliance	Minerals and Energy Resources	Although on its face, the titles of the particular oil and gas categories and the number of acres placed within a category may appear to have accommodated the expressed need to protect more sensitive lands from various development actions, in actuality the BLM preferred alternative exposes more lands to development. Of the approximately 2 million acres not closed under BLM's preferred alternative, more of these remaining lands are open to unrestricted leasing and development. Specifically, approximately 992,521 acres are currently open with standard lease terms; the Draft RMP's preferred alternative would increase that figure to 1,183,476. Further, of the areas now subject to minor constraints, the majority are already leased. Therefore, under the BLM's preferred alternative, the oil and gas industry will have the maximum opportunity for unrestrained development on lands that have never been (or are not currently) leased.	Please see general comment responses #18 and #101. There would be no “unrestrained” leases. At a minimum, all leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Southern Utah Wilderness Alliance	Minerals and Energy Resources	BLM needs to consider options to protect currently leased areas of conflicting resource values: Simply because an area is currently leased should not prevent consideration of designations that conflict with oil and gas development. Indeed, that would exclude many outstanding lands within the Price resource area from uses other than mineral extraction, and result in an unbalanced RMP. Rather, the BLM must consider removing any particular area from leasing. The existing leases may either simply expire without incident and not be reissued, or, should the leaseholder file an APD, the BLM could suspend such leases pending further consideration of the area's resource values. In addition, the national interest in certain lands, the importance of their preservation, and their unique beauty and wildlife habitat all justify the purchase or exchange of overlapping lease parcels. Concerns expressed above with regard to oil and gas development also apply to other leasables, including but not limited to, tar sands, oil shales, potash, phosphate, and gilsonite. Leasing and development of such resources should not be permitted on lands of conflicting resource values, especially wilderness-quality lands.	Please see general comment response #18, #36 and #101. As noted in the comment, existing leases may simply expire. Therefore, suspensions, purchase and exchange are site-specific considerations rather than land use plan level decisions. The range of alternatives analyzed in the Proposed RMP/Final EIS provides for consideration of other uses in areas that are currently leased. See general comment response #2.
Southern Utah	OHV Route	PFO must take into account not only the increase in ORV use, but also the damages caused to the natural resources by such use, and the heightened conflict between user groups as the number of ORVs increase and	Please see general comment response #19. The impacts of OHV use on other resources and uses

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Wilderness Alliance	Identification	heretofore non-motorized areas are being transformed into motorized areas.	are addressed in Chapter 4 of the Proposed RMP/Final EIS.
Southern Utah Wilderness Alliance	OHV Route Identification	The Draft RMP, however, fails to adequately address [...impacts to] cultural resources, disturbance of wildlife habitat, disruption of grazing activities, and damage to natural ecosystems [...and] user conflicts.	Chapter 4 of the Proposed RMP/Final EIS analyzes the impacts of OHV management on resources and uses including cultural resources, wildlife habitat, livestock grazing and vegetation, wilderness characteristics and non-motorized recreation.
Southern Utah Wilderness Alliance	OHV Route Identification	The Draft RMP fails to take a hard look at the potential environmental effects of designating particular routes. There is little doubt that motorized routes in sensitive areas including riparian areas, fragile soils, wildlife habitat, cultural resource areas, roadless, and scenic areas can have adverse impacts on those natural resources. The federal regulations (43 C.F.R. 8342.1) require BLM to "minimize damage" to these natural resources, and "minimize conflict" with other users, yet there is no indication in the Draft RMP that the PFO has considered and analyzed the site-specific environmental consequences and impacts to natural resources and other users of designating particular motorized routes proposed in the Draft RMP. Not only does the Draft RMP fail to comply with the Federal Regulations noted above (see, 43 C.F.R. 8342.1), it also fails to take into account the public sentiment, as documented in the comments received by the PFO for this RMP revision.	See general comment responses #12, #19 and #20.
Southern Utah Wilderness Alliance	OHV Route Identification	In order to remedy this situation and maintain a balanced spectrum of recreational opportunities, the current road/trail system must be segregated into motorized and non-motorized portions.	Please see general comment response #19
Southern Utah Wilderness Alliance	OHV Route Identification	In order to provide a balanced range of recreational experiences, clearly some routes must not be designated "open" to motorized vehicles. If someone objects to a closure of any of the routes listed in SUWA's Attachment D (and in more detail in the GIS data we have submitted to BLM), they should propose an alternate plan that would achieve the same degree of balance (i.e. 35% of the PFO more than a mile from a motorized route, 14% more than two miles from a motorized route and 4% greater than three miles from a motorized route). It is important to note that SUWA's proposal leaves a large majority of the field office relatively close to a motorized route. In particular, over 40% of the field office area would be within one-half (1/2) mile of a motorized route and 65% of the field office area would be within a mile of a motorized route. (See Attachment E). This approach is supported by the Federal Regulations governing ORV use on BLM lands. The ORV regulations require BLM to take quiet and balanced recreational opportunities into account when designating ORV routes, trails, and open areas.	See general comment responses #12 and #19
Southern Utah Wilderness Alliance	OHV Route Identification	The San Rafael Travel Plan (SRTP) Route Designations are conspicuously absent from the Draft RMP. Not only is this curious, but it is seriously misleading. None of the maps of the proposed route designations included in the Draft RMP reveals the motorized routes designated in the SRTP.	Please see general comment response #20
Southern Utah Wilderness Alliance	OHV Route Identification	There are several routes in that SRTP that continue to be controversial, and that are causing significant impacts to natural resources and continue to cause conflict among various user groups. SUWA requests that BLM reconsider these route decisions in the SRTP. In particular, we request that PFO reconsider the routes located within Sids Mountain WSA, as these route decisions continue to be controversial and the routes continue to cause resource damage and conflict among user groups	See general comment responses #12, #15 and #20.

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Southern Utah Wilderness Alliance	OHV Route Identification	The CCHP presents a reasonable travel plan that provides for a workable balance between motorized and non-motorized uses and minimizes potential damages to sensitive resources by appropriate route designations. BLM must consider and analyze this reasonable alternative as part of the RMP revision process.	Please see general comment response #35
Southern Utah Wilderness Alliance	Process and Procedures	The two fatal flaws of the Price Draft Resource Management Plan (Draft RMP) are: 1) its failure to protect 98 percent of wilderness-quality lands outside of existing WSAs from oil and gas development; and 2) the lack of any meaningful ORV management.	Please see general comment responses #1, #19, #36 and #101
Southern Utah Wilderness Alliance	Process and Procedures	The Draft RMP even fails to accurately inform the public of the alternatives, as narrow as they are, that are under consideration. As a result, the Draft document undermines public involvement in the RMP review and development process, and fails to solicit meaningful comment.	Please see general comment response #2 and #145
Southern Utah Wilderness Alliance	Process and Procedures	Because the BLM has failed to offer adequate draft alternatives for the Price Resource Management Plan, the Southern Utah Wilderness Alliance (SUWA) supports the Castle Country Heritage Plan (CCHP).	Please see general comment responses #2, and #35
Southern Utah Wilderness Alliance	Process and Procedures	SUWA expects the BLM to consider fully and to analyze the Castle County Heritage Plan as part of the RMP revision process, and prior to release of the final RMP.	Please see general comment response #35
Southern Utah Wilderness Alliance	Process and Procedures	SUWA supports the Castle Country Heritage Plan. SUWA has previously submitted information to the PFO, including a proposed travel plan, and recreation opportunity spectrum maps. SUWA's travel plan was drafted in accordance with the federal regulations and is a reasonable alternative that must be analyzed in the RMP revision process. Due to BLM's failure to include an alternative that meets the federal requirements for travel plan route designations and contains a fair allocation of recreational opportunities, SUWA's travel plan has been adopted by members of the public and has been incorporated into the Castle Country Heritage Plan (CCHP).	Please see general comment response #35
Southern Utah Wilderness Alliance	Process and Procedures	The Price Draft RMP contains serious flaws and lacks full consideration and adequate analysis of several important resource values and concerns. SUWA has provided the BLM with comments, maps, and other sources of information throughout the RMP revision process, including the information that forms the Castle Country Heritage Proposal - a balanced approach to multiple resource management in the Price FO. SUWA expects the BLM to consider fully and to analyze the CCHP, in addition to the comments below, as part of the RMP revision process, and prior to release of the final RMP.	Please see general comment response #35
Southern Utah Wilderness Alliance	Recreation	1. The Draft RMP fails to comply with NEPA's requirement to provide an adequate range of alternatives and to take a hard look at the effects. Although the Draft RMP includes several alternatives for ORV route designations, it fails to include an alternative that would preclude ORV use in WSAs, proposed wilderness areas, areas that the PFO has found have wilderness character and/or a reasonable probability of wilderness character, and other sensitive areas. In addition, none of the alternatives in the Draft RMP includes hiking trails, horse-riding trails, or bicycle trails; none of the alternatives addresses non-motorized recreation and trails. Thus, the Draft RMP violates NEPA's requirement that the agency provide a reasonable range of alternatives for the public to consider, and for the agency to analyze in order to make a fully informed decision.	Please see general comment responses #2, #15, #36 and #79
Southern Utah Wilderness Alliance	Recreation	The Draft RMP fails to provide a fair allocation of recreational opportunities. Although the Draft RMP includes a description of the various recreational opportunity spectrum classifications for which lands can be managed, it is impossible to decipher the acreages within the various classifications under the various alternatives as key information is omitted from the maps and charts. Based on a review of the maps, however, the alternatives fail to provide adequately for quality, non-motorized recreational opportunities.	Please see general comment responses #2, #14 and #15
Southern Utah Wilderness Alliance	Recreation	This approach essentially measures the percentage of the field office area that is within various distances of the nearest motorized trail. Currently, 80% of the PFO area is within one mile of a motorized route, and less than 1%	Please see general comment responses #14 and #15

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		is greater than 3 miles from a motorized route (see Recreation Opportunity Spectrum maps, Attachment A - Exhibit 2, and Pie Charts at Exhibit E). There are few, if any places a non-motorized user can go to escape the sights or sounds of ORVs. Clearly this situation does not provide equal recreational opportunities for non-motorized uses. SUWA proposes a road/trail system that does an efficient job of creating quiet areas that are a comfortable distance from the noise of motorized routes. By "efficient" we mean that it closes as few routes as possible to achieve the level of balance that it does. We also advocate closure of particular motorized routes that negatively impact popular non-motorized areas. For detailed discussions of specific areas and routes, see Attachment D. In addition, this information is summarized in a table at Attachment D-Exhibit 3.	
Southern Utah Wilderness Alliance	Recreation	SUWA makes the following recommendations to PFO regarding balancing the recreational opportunities: • Do not designate motorized routes that do the greatest damage to non-motorized recreational opportunities (e.g. routes which penetrate into otherwise roadless areas, or routes which interfere with popular hiking/biking areas). • Ensure that a reasonable percentage of the Field Office area is at least one mile from a motorized route, and that 5%, or more, is greater than three miles from a motorized route. This allocation will help maintain a balanced spectrum of recreational opportunities as motorized use continues to increase. • Fairly allocate the existing network of dual use routes (motorized and non-motorized on the same route). Of existing popular dual use routes, roughly half should be designated as non-motorized.	Please see general comment responses #14 and #15
Southern Utah Wilderness Alliance	Wilderness	While the Draft RMP recognizes wilderness characteristics on nearly three times the acreage that falls within existing Wilderness Study Areas (WSAs), it neglects to consider any alternative that would provide meaningful protection of these identified wilderness characteristics. This is in direct violation of the National Environmental Policy Act's (NEPA) requirement to fully consider reasonable alternatives, and agency internal direction to consider alternative management options to protect these lands.	Please see general comment response #36
Southern Utah Wilderness Alliance	Wilderness	The Price Field Office encompasses a stunning variety of wilderness lands deserving of official protection. Indeed, of the roughly 2.5 million acres of public lands managed by the BLM Price FO, approximately 1.5 million acres are proposed for wilderness designation in America's Redrock Wilderness Act (S. 639/H.R. 1796). Of these, BLM itself has determined that roughly 1,485,598 acres, or about 99% of citizen-proposed wilderness lands have, or are likely to have, wilderness characteristics.3 Unfortunately, the Draft Plan fails to provide any meaningful protection for the wilderness-quality lands that do not currently fall within the boundaries of existing WSAs. In other words, outside the existing WSAs, the BLM's preferred alternative leaves approximately 98% of the remaining 1 million acres of wilderness-quality lands open to oil and gas leasing and development and other harmful activities. The new Price RMP must provide real protection for these wild lands -- not continue to expose them to undue and unnecessary degradation and the permanent impairment caused by oil and gas activities, and irresponsible ORV use.	Please see general comment response #36
Southern Utah Wilderness Alliance	Wilderness	During the RMP scoping process and other public comment opportunities, SUWA submitted comments specific to the BLM wilderness inventory areas (WIAs) and the BLM reasonable probability determination areas (RPDs), as well as supplemental and new information regarding other tracts of wilderness-quality land for the BLM to consider within the RMP. Unfortunately, the Draft RMP fails to incorporate adequately and to address the new information that SUWA has provided, and fails to provide meaningful protection for these lands. SUWA now incorporates its earlier comments, and submits additional supplemental and new information for the BLM to	See general comment response #36. BLM considered the information referred to in the comment along with additional information on non-WSAs lands suggested to possess wilderness characteristics and prepared the Supplement to the Draft Resource Management Plan/Draft

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		analyze fully and to consider during the RMP revision process and prior to the release of the Final RMP. See Attachment B Supplemental and New Information Forest Service/BLM Adjacent Wilderness Units; Attachment C, Supplemental and New Information Price River Wilderness Unit.	Environmental Impact Statement describes that analyzes the impacts of a sixth alternative (Alternative E) for managing the public lands administered by the Price Field Office. Alternative E would emphasize protection of non-Wilderness Study Area (non-WSA) lands with wilderness characteristics.
Southern Utah Wilderness Alliance	Wilderness	The Draft RMP fails to consider fully and to analyze the full spectrum of available management options that could provide protection of wilderness characteristics, as provided for by FLPMA and BLM instruction memoranda IM 2003-274 and IM 2003-275-Change 1. In order to comply with its multiple-use mandate and instruction memoranda, it is incumbent on the BLM to ensure protection of these identified wilderness resource values.	Please see general comment responses #36 and #108
Southern Utah Wilderness Alliance	Wilderness	The Draft RMP fails to include an alternative that provides protection for these lands consistent with the recognized resource values and public desires. Rather, every alternative allows some degree of leasing, development, and motorized recreation within these areas, and protection from such actions essentially only exists within the existing WSAs ... even under the "conservation" alternative c.'	Please see general comment response #36
Southern Utah Wilderness Alliance	Wilderness	Providing for balanced recreational opportunities is certainly one way of helping to ensure that naturalness, solitude, and primitive recreation are preserved on qualifying lands, and that the multiple-use mandate is respected. On November 14, 2003, SUWA provided the BLM with information and a map depicting a balanced, full-spectrum land management approach. Also, on March 25, 2004, SUWA submitted information regarding the recreational opportunity spectrum within the BLM Price FO for consideration during the RMP revision process. Unfortunately, the Draft RMP ignored this information, and failed to consider special recreation management areas that would reflect a balanced approach to recreational opportunities and other public land uses.	Please see general comment responses #35 and #36
Southern Utah Wilderness Alliance	Wilderness	BLM has identified nearly one million additional acres of lands that have or that is likely to have wilderness characteristics, but has not provided adequate protection of these resource values within the Draft RMP. The Interior Department has assured the public that there are several other ways in which these areas can be protected from damage. In a statement entitled "Wilderness Settlement Proposal Summary," the Department of Interior explained its position: Interior can protect areas in their natural state using other tools besides the wilderness designation process. Interior plans to consider wilderness inventories and recommendations from wilderness advocates in its planning process, and fully anticipates that many areas will be managed in their natural state to preserve wilderness characteristics....There are a wide range of mechanisms for land protection. Chief among these mechanisms, of course, is the protection afforded by ACEC designation and its attendant management prescriptions. Unfortunately, the BLM plan does not propose ACEC designation for the majority of wilderness character lands.	Please see general comment responses #36 and #141
Southern Utah Wilderness Alliance	Wildlife and Fish	Similar to the problems invited by discretionary stipulations, the concept of "Best Management Practices" (BMP), although phrased nicely, fails to provide any certainty of protection and is again open to the dynamic will of the current management without any public review. Indeed, BMPs are generally "negotiable" and actually negotiated with the operator. Therefore, rather than committing to BMPs in Section 2.8.5 of the Draft RMP, the document must disclose to the public specific standards as part of the stipulations that include a vehicle for public	Please see general comment response #41

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		involvement.	
Southern Utah Wilderness Alliance	Wildlife and Fish	The Draft RMP leaves open how off-site mitigation strategies will be developed and what standards will apply. This represents a rollback from existing protections.	Please see general comment response #41
State of Utah	ACEC	No discussion is evident concerning the ACECs previously established in the current plan, except for those which became enfolded within part of a new ACEC. Each and every proposed ACEC should be analyzed anew, and justified for the life of the new plan.	Appendix L of the Proposed RMP/Final EIS includes a summary of the relevant and important values of each of the existing ACECs. This a summary of the information contained in the San Rafael RMP. Also, see GCRs 127 and 131.
State of Utah	ACEC	The Lower Green River proposed ACEC discusses the opportunity for primitive recreation and wilderness characteristics as reasons for this ACEC and these are not valid reason for establishing an ACEC. Temple-Cottonwood-Dugout Wash ACEC identifies “opportunities for primitive recreation due to the solitude” of the area as its importance and relevance factor. Range Creek ACEC lists cultural resources, wildlife habitat and a riparian corridor as the importance and relevance factors. Additionally, no discussion is evident concerning the nature or type of threat of irreparable damage to any of the factors listed as relevant or important.	Appendix L of the Proposed RMP/Final EIS discussion of the relevant and important values of these ACECs no longer uses recreation or wilderness as relevant and important values. Appendix L has also been modified to include a generalized discussion of any threats to the Relevant and Important values. See GCRs 141 and 153.
State of Utah	ACEC	As a general comment, the ACEC tool was intended by Congress to be limited in its scope to areas where it was necessary to protect and prevent (not either/or) irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or important historic, cultural or scenic values, fish and wildlife resources or other natural systems or other natural systems or processes or to protect life and safety from natural hazards. The designation is not appropriate when relevant values are merely subject to some impairment. The threat must rise to a level of actual damage. Damage that is threatened or that is temporary does not fit the criteria for consideration as an ACEC.	See GCR 153.
State of Utah	ACEC	2-106 Alternatives: Where ACECs currently exist and alternative are proposed to release them management prescriptions were proposed other than the very broad and indefinable “manage according to other resource decisions” there are prescriptions that could have been proposed that would make these alternatives viable. Failure to present viable alternatives biases the selection of alternatives toward selection of one that maintains the ACEC. In some cases no other alternatives were considered. Both situations could be viewed as the outcome being predetermined. Even though the relevance and importance of the values to be protected are questionable these values could be protected to the same degree with management restrictions less restrictive than those proposed.	See GCR 131.
State of Utah	ACEC	2-110, Dry Lake ACEC: The NSO for oil and gas and avoidance for ROW grants is not consistent with uses permitted elsewhere in the alternative. Both oil and gas and ROW activities can be designed to prevent damage to cultural resources, this is a current practice and provided for in law and regulation that govern such resources.	See GCR 30.
State of Utah	ACEC	2-111, 1-70 ACEC: There is no indication of the width of this ACEC in the Draft RMP/EIS.	The width of the I-70 ACEC varies and is shown on Maps 2-45 to 2-49 and Map 2-66 of the Proposed RMP/Final EIS.
State of Utah	ACEC	2-112 Muddy Creek ACEC: Alternatives here list areas as open to mineral entry. However, Map 2-37 shows the area in and outside the WSA to be recommended for mineral entry withdrawal.	The inconsistency between the text and the map has been resolved in the Proposed RMP/Final EIS (See Maps 2-35 to 2-39 and Map 2-64).
State of Utah	ACEC	2-121: Map 2-47 shows a “Horseshoe Canyon” ACEC but it is not addressed in Chapter 2.	The nominated Horseshoe Canyon ACEC was incorporated into the “Lower Green River ACEC”

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			and should not have been identified on Map 2-47. This error has been corrected in the Proposed RMP/Final EIS.
State of Utah	ACEC	2-124, Nine Mile Canyon ACEC: Alternatives B, C, and D refer the reader to Map 2-44, 2-45, and 2-46 which speak to the Vernal Alternative A. There are no such references on those maps and should not be. The meaning of the references is unknown.	ACEC descriptions on page 2-124 regarding Nine Mile are confusing. There is an existing and proposed Nine Mile Canyon ACEC in the Vernal RMP. The two offices have coordinated the size and the management prescriptions, so that the boundaries would be contiguous and the management would be the same.
State of Utah	ACEC	ACECs: There is no analysis of the need for expanded or additional ACECs in the planning issues section.	See GCR 127.
State of Utah	ACEC	ACECs: Potential ACECs must meet the statutory requirements set forth in FLPMA, which require a showing that "special management attention is required" to "protect and prevent irreparable damage" to an area. Other regulatory requirements concern a showing of relevance and importance. The analysis of the newly proposed ACECs presented in Appendix 26 does not meet this standard, and consists of statements about relevance and importance which are apparently designed as self-evident explanations rather than careful analysis.	See GCR 153.
State of Utah	ACEC	The discussion of the proposed Uranium Mining Districts ACEC indicates the sites have recently become "more fragile." How so? What does this mean, and is it irreparable? State law requires the BLM to analyze the features found to be important and relevant on a regional basis against activities which are within the multiple-use mandate of the BLM. This requires an analysis of the feature against the effects of grazing, recreation, mining and so forth, and the nature of the irreparable damage which may result. None of this analysis is evident.	Please see GCRs 152 and 153.
State of Utah	ACEC	The state is concerned about the proposed excessive withdrawal of acreage to protect archaeological resources in the proposed Nine Mile Canyon and Range Creek ACECs. The cultural resources in those areas are certainly world class, but the provisions for examining an undertaking under the National Historical Preservation Act protect these resources. The opportunity to protect the cultural resources through flexible requirements negotiated with the State Historic Preservation Officer can keep surface disturbing activities away from key resources, and provide mitigation for non-significant impacts. The BLM should simply consider employing the standard lease term which does not allow oil and gas activity within 100 feet of an archeological site, and draw a 100 foot buffer around all the identified archaeological sites in Nine Mile Canyon and Range Creek.	Please see GCRs 30, 154 and 155.
State of Utah	ACEC	On Page 4-504, the Draft EIS discusses the proposed Lower Green River ACEC. The analysis thereafter states that "no threats have been identified to the relevant and important value." Alternatives B and C then propose to establish an ACEC, even though no threats of irreparable harm have been identified. A similar discussion is found on Page 4-506 concerning the proposed Beckwith Plateau ACEC. If no threat of irreparable damage can be demonstrated, the BLM must conclude an ACEC is not appropriate.	See GCR 153.
State of Utah	ACEC	The state objects to the statements found on page 4-525 concerning the effects of ACECs on Minerals and Energy. The analysis indicates that ACECs will not affect Minerals and Energy, except as noted, because ACECs would not be located in areas of reasonable and foreseeable oil and gas development. This statement is not supportable given the state's concerns about the inadequacy of RFDs prepared to this point. The state requests the BLM revisit this analysis as the mineral RFDs are reworked.	Appendix M of the Proposed RMP/Final EIS updates the RFD. The Proposed RMP/Final EIS addresses impacts by ACEC in terms of relevant and important values rather than analyzing all ACECs together as was done in the Draft RMP/EIS.
State of Utah	ACEC	As a general comment, the need to continue the existence of current ACECs needs to be analyzed. That analysis has not been provided to the cooperators.	See GCR 127.

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State of Utah	ACEC	2-123, Range Creek ACEC: This ACEC is proposed to protect cultural and natural process values. “Natural process” values are not defined in the Draft RMP/EIS.	See GCR 129.
State of Utah	ACEC	2-123, Range Creek ACEC: There are no values listed in the relevance and importance analysis that are not or could not be protected with current policies and regulations. The closure for oil and gas is in a high potential area for oil and gas and coal bed methane. The mineral entry closure has potential coal reserves. There are SITLA lands within the ACEC that would not be developable if ACEC is designated. These losses must be analyzed.	See GCR 157.
State of Utah	ACEC	2-124, Nine Mile Canyon ACEC: The description as to the status of oil and gas is difficult to determine the way it is written. It appears to say that the areas covered by an ACEC and that are within the canyon rim would be NSO where lands outside the rim would be open with minor constraints.	Maps 2-27 to 2-31 in the Draft RMP/EIS detail the oil and gas leasing in the Nine Mile Canyon ACEC.
State of Utah	ACEC	2-124, Nine Mile Canyon ACEC: Nine Mile Canyon ACEC is a coal potential area and a high oil and gas potential area. The impacts to these resources must be analyzed and are not. 2-129, Uranium: This is a high potential oil and gas area and the inability to access these resources must be analyzed and impacts reported. There is no analysis of the impact of NSO in this high potential area.	Please see GCRs 132 and 152.
State of Utah	ACEC	2-124, Nine Mile Canyon : The fact that Nine Mile Canyon is currently covered by several special designations and numerous laws and regulations would support Alternative A as the preferred alternative. The other alternatives are overly restrictive given current protections.	See GCR 154.
State of Utah	ACEC	2-129, Uranium: The ACEC fails to meet the test for relevance and importance as the cultural resources can be protected within current law policy and regulations. The fact that the area is proposed to be open for mineral entry, mineral materials and NSO for oil and gas is not consistent.	See GCR 30.
State of Utah	ACEC	2-129, Uranium: Alternative C lists the area open to mineral entry but Map 2-35 shows it to be proposed for withdrawal.	Table 2-19 in the Proposed RMP/Final EIS indicates that the Uranium Mining Districts ACEC would remain open to mineral entry under Alternative C. Map 2-38 in the Proposed RMP/Final EIS correctly shows the ACEC as open to mineral entry.
State of Utah	ACEC	4-519, Impacts To Cultural Resources: Here it states that closure of four ACECs to grazing is not anticipated to impact livestock grazing. Table 4-20 indicates that 5,489 acres will be withdrawn in the four ACECs. That is a significant amount. There is no indication of the basis for the no anticipated impact finding.	The impacts section has been revised to better present the impacts that will occur to grazing from ACEC prescriptions. Also see GCR 152.
State of Utah	ACEC	4-525, Nine Mile Canyon : Here it states that Nine Mile Canyon ACEC is NSO. Map 2-31 shows only the canyon to be NSO. Chapter 2 is not clear but implies only the canyon is NSO. In a recent meeting with PFO staff we were assured only the canyon was NSO. Reading further the area in the ACEC is a VRM Class III with minor restrictions on oil and gas development.	The proposed RMP/Final EIS clarifies where oil and gas leasing would be allowed within Nine Mile Canyon ACEC subject to the various constraints.
State of Utah	ACEC	2-111, I-70 ACEC: There is a range of alternatives offered as to the length of this designation but not for the management prescriptions that are to be applied to it.	The I-70 ACEC is an existing ACEC and the management prescription has worked to protect the area. The BLM sees no need to change the prescription but only the area to which it applies. Also see GCR127.
State of Utah	ACEC	2-11, 1-70 ACEC: A VRM Class I is inappropriate. The BLMs visual resource handbook provides that Class I is to be applied to areas where previous decisions have been made to manage for natural landscapes.	The I-70 ACEC was designated in the 1991 San Rafael RMP. The existing prescription is VRM Class I to protect the natural landscapes visible from Interstate 70 thus preserving the visual experience of the public traveling the interstate.

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State of Utah	Alternative Maps	Oil and Gas - Map 17 of the Mineral Report does not reflect the overlap of the oil and gas play areas because the mapping scheme is not transparent, Multiple vertical plays underlying the same area need to be shown, and not merged into a one-dimensional geographical representation. Three play types, Basin Flank Mesaverde (USGS play 2018), Tight Gas Uinta Tertiary West (play 2016), and Uinta Tertiary Oil and Gas (play 2002), cannot even be seen on the map, and these three are some of the most prospective in the planning area, and underlie part of the proposed Nine Mile Canyon ACEC. This map does not allow the reader to understand that some portions of the planning area have multiple play zones that can be targeted, thus increasing the chances of a well hitting commercial petroleum deposits and making those areas more desirable for future exploration and development. The map should be revised to allow the overlapping of the play areas to be visualized. Map 3-21 of the RMP, Conventional. Oil and Gas Occurrence Potential, incorrectly labels the combined area of all the plays from Map 17 as having high occurrence potential with only “C” level of certainty rather than a “D” level of certainty for those plays that contain producing oil and gas fields that provide “abundant direct and indirect evidence” to support the presence, and likely future development potential, of petroleum resources. The Uinta Tertiary Oil and Gas (play 2002), Tight Gas Uinta Tertiary West (2016), Cretaceous Sandstone (play 2107), Cretaceous Dakota to Jurassic (play 2004), and the Penno-Triassic, inconformity (play 2106) plays all have (or had) producing petroleum deposits within the planning area and should be given a “D” rating of certainty of occurrence, The other plays could have a rating of “C” since the direct evidence, though not abundant, indicates the occurrence of petroleum in these plays. Company interest indicates future exploration of these plays will extend into the planning area in the next 15 years.	Maps 3-18 through 3-27 of the Proposed RMP/Final EIS present the minerals potentials for the Price FO area. Overlaps have been analyzed in the text of the Final EIS.
State of Utah	Alternative Maps	In Table 2-16, p. 2-101, Locatable Minerals: The entries are confusing because they refer to areas open for mineral leasing rather than mineral location. The maps showing areas recommended for withdrawal are incorrect. The Draft RMP/EIS does not contain any maps for coal, gypsum, sand and gravel, and clay and stone.	The language for locatable minerals in Table 2-17 of the Proposed RMP/Final EIS has been corrected. Maps 2-35 to 2-39 and Map 2-64 (Areas Recommended for Withdrawal from Mineral Entry) have been updated and corrected. Coal Map 2-56 has been added. Occurrence potential for gypsum, sand and gravel, clay, and stone has been added to Maps 2-35 to 2-44 and Maps 2-64 through 2-65 as appropriate.
State of Utah	Alternative Maps	The state supports the decision to withdraw the Gordon creek Wildlife Management Area from entry under the General Land and Mining Laws (2.8.5 Minerals and Energy Development pg. 2-17). The Federal leases in this area were relinquished by River Gas Corporation as mitigation to offset the disturbance and direct loss of big game habitat from the coalbed methane development analyzed in the Price Coalbed Methane EIS. This area is crucial winter habitat for mule deer and elk, and serves as a refuge for wintering wildlife from the disturbance related to coalbed methane development, as well as from the increased traffic on the miles of newly created or upgraded roads in the area. The importance of this Wildlife Management Area continues to increase as more roads are developed for energy development. We request that the map of the withdrawal area (Map 2-36) be carefully reviewed for accuracy, as it does not appear to accurately reflect the entire withdrawal area.	Maps 2-35 to 2-39 and Map 2-64 (Areas Recommended for Withdrawal from Mineral Entry) have been updated.
State of Utah	Alternative Maps	Map 2-52, Transportation Utility Corridors Alternative B and D, contains an error. The map fails to show the existing gas pipeline corridor along Nine Mile Canyon. If, as the Draft RMP states, the BLM recognizes valid existing rights of way, this Map of Transportation Utility Corridors for alternatives B and D should show all the valid existing corridors as acceptable future rights-of- way.	The BLM recognizes valid existing rights-of-way(ROWs). The Transportation Utility Corridor Maps show only existing approved corridors. Not all ROWs such as the Nine Mile Canyon gas line are corridors.
State of Utah	Alternative Maps	2-117, Segers Hole ACEC: See previous comments on NSO on large tracts. There are no SITLA lands within this	Table 2-19 of the Proposed RMP/Final EIS shows

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		ACEC, but there is a general comment as an example. This is an area with high mineral potential. This area is a current ACEC and is proposed to be a maintained as one. It is not clear that the management prescriptions listed here are the current ones. Area is shown here as open to mineral entry but is reflected as a withdrawal on maps.	that the management prescriptions for the Seger's Hole ACEC are common to all alternatives including the No Action Alternative. The ACEC would be open to mineral entry with a notice or plan of operations required before mining activity. Maps 2-35 through 2-39 and Map 2-64 all show that the Seger's Hole ACEC would not be recommended for withdrawal from mineral entry.
State of Utah	Alternative Maps	2-117, 2-118, Sid's Mountain: It appears that the proposal to manage this area as open to oil and gas is in error as Maps 2-28 to 2-31 list this area as closed. Map 3-26 lists Sid's Mountain as a WSA which is not reflected in the "No Action" Alternative Map 2-42, 44, 45, and 46 lists the same area as an ACEC. On Page 2-103 this area is proposed to be included in the San Rafael Swell SRMA with similar restrictions. Additionally, the level of restrictions placed on other resources would indicate that the intent is to manage this area to a standard of non-impairment (defacto wilderness). See previous comments on this issue. Area is listed as open to mineral entry in the alternatives but shown as proposed for withdrawal on the maps. See previous comments on VRM Class I. VRM Class I is proposed here but is inconsistent with open to oil and gas with minor constraints and open mineral entry. Alternative A is the only viable alternative.	Table 2-18 of the Proposed RMP Final EIS explains that BLM would continue to manage all WSAs (Map 3-28) according to the Interim Management Policy for Lands Under Wilderness Review (IMP, BLM Handbook H-8550-1) until legislation is enacted to either designate the areas as wilderness or release them for uses other than wilderness. The only decisions related to WSA management to be made in the Price RMP are VRM and OHV designations. Under the Mineral Leasing Act, and the IMP, WSAs are closed to leasing. Since the Sid's Mountain ACEC would be mostly within the Sid's Mountain WSA, the ACEC would be closed to leasing on the WSA portions of the ACEC. This is shown on Map 2-34 of the Proposed RMP/Final EIS. Table 2-19 explains ACEC management for the Sid's Mountain ACEC. For the No Action Alternative, the original ACEC management prescription for oil and gas leasing is open to leasing subject to minor constraints, but WSA management takes precedence and those portions of the ACEC within the WSA would be closed to leasing unless Congress releases the WSA for uses other than wilderness.
State of Utah	Alternative Maps	In several of the alternatives mineral entry is listed as "open" yet listed as recommended for withdrawal on Map 2-32 to 2-36. Map or text must be corrected.	The maps referenced in the comment have been updated and included as Maps 2-35 to 2-39 and Map 2-64 in the Proposed RMP/Final EIS.
State of Utah	Cultural Resources	The State of Utah believes that some of the discussion of cultural resource protection in the Draft EIS is self-serving in nature, and does not disclose the true nature of the cost of cultural resource survey and mitigation. On page 4-110, for example, the impacts of protective cultural resource management through the requirement to conduct cultural resource inventories (surveys) are discussed in relation to minerals and energy. The requirements under each alternative are precisely the same, except for the proposal to extend the area of survey from 100 to 300 feet beyond the area of direct impact within Alternatives B and C. Page 4-93 indicates the required survey must be a complete Class III inventory for undisturbed areas, which is thorough and very expensive to conduct.	Preservation of cultural resources is not optional. Cultural resource inventories allow for cultural resources to be avoided during project implementation. While inventories may delay projects and increase costs compared to no inventories, discovery of cultural resources during project implementation, with workmen and equipment on site, would increase the cost even

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			further and could also result in damage to cultural resources, which is contrary to federal law, regulation and policy. However, increasing the distance inventories are required from 100 and 300 foot buffers is an RMP decision that could have an impact on cost and schedule compared to requirements of law.
State of Utah	Cultural Resources	Page 4-456 through 4-460: Terminology related to mineral entry, locatable, salables and leasing are misused specifically related to impacts to cultural and paleontology resources. Page 4-469, Table 4-1: The table does not agree with others in the document. Figures need to be QC'd.	The Section of “locatables” has been reviewed and all misused terminology has been corrected. The tables in the Proposed RMP/Final EIS have been edited to improve clarity.
State of Utah	Cultural Resources	Cultural resource surveys: Despite the different acreage involved due to different distance requirements for survey from the direct impact area, no cost differential is disclosed as part of the impact analysis for each Alternative, leading to the conclusion that the cost per acre for Class III survey is the same for all projects.	Preservation of cultural resources is not optional. Cultural resource inventories allow for cultural resources to be avoided during project implementation. However, increasing the distance inventories are required from 100 to 300 foot buffers is an RMP decision that could have an impact on cost and schedule but the exact cost of this increase is unknown.
State of Utah	Cultural Resources	The state also has concerns about the conclusion that the potential for costly delays is reduced due to the requirement to survey. On its face, the statement has some appeal. However, this self-serving conclusion is not a substitute for solid data and analysis of the economic impacts of cultural resource survey and mitigation to the operators of mineral and energy projects, nor of the environmental impacts of such surveys. Class III surveys and mitigation measures have an impact on mineral operations, which should be disclosed. The proposed Alternatives should analyze the possibility and impacts of different types of survey. The statement about reducing costs during construction is an attempt to hide the coasts of compliance by simply citing the requirements of the law authorizing the survey in the first place. The statement ignores the reality of the process required by BLM”s interpretation of the cultural resource protection laws. BLM cannot claim that the impacts to oil and gas and other energy producers from survey are beneficial to those producers when, in fact, BLM's decision to require an expensive survey in all cases simply represents BLM's decision to implement Section 106 in this manner; which Section 106 requirements are designed to disclose those very impacts anyway? Section 106 of the National Historic Preservation Act requires the BLM to take into account proposed undertakings (actions) upon cultural resources, This is to be done in consultation with the State Historic Preservation Officer. The law allows for flexibility in this process, which may be reflected in the level of survey required, or in the type of mitigation involved. The BLM has already foreclosed some of this flexibility by requiring a Class III survey in all cases. The state believes that decision about the need to conduct a survey, and the type and extent of the survey should be based on the economics of the proposal and the expectation of the presence of resources, in consultation with the SHPO, and not predetermined by the BLM. The state requests that this process be reconsidered in light of the state's policy of requiring survey levels be determined by a balance between appropriate cultural resource protection and the needs of other resources.	The RMP cannot affect compliance with Federal law requiring cultural resource preservation. Preservation of cultural resources is not optional. Cultural resource inventories allow for cultural resources to be avoided during project implementation. While inventories may delay projects and increase costs compared to no inventories, discovery of cultural resources during project implementation, with workmen and equipment on site, would increase the cost even further and could also result in damage to cultural resources, which is contrary to federal law, regulation and policy. However, increasing the distance inventories are required from 100 and 300 foot buffers is an RMP decision that could have an impact on cost and schedule compared to requirements of law. This is noted in the Proposed RMP/Final EIS.
State of Utah	Cultural Resources	Chapter 2, Cultural Resources: The state has concerns about the proposal to extend the geographic area of survey out beyond the area actually proposed for direct impact (disturbance), in Alternatives B and C.	The Draft RMP/EIS evaluated a range of alternatives in detail to assure a balanced approach

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			that allows opportunities for resource use and development while protecting cultural resources is considered. In the past, some cultural resources have been impacted by surface disturbing activities beyond the immediate footprint of disturbance. As a result, alternatives were analyzed to increase cultural resource protection by increasing the areas inventoried prior to surface disturbance.
State of Utah	Cultural Resources	The state is concerned about the statements in this analysis that for “larger cultural sites” the ability to develop oil and gas may be constrained, or directional drilling required. The analysis states that smaller sites could be avoided, and features like roads and drill pads relocated to avoid smaller sites. Smaller cultural sites would presumably include rock art panels and the like, What are the larger sites? Directional drilling can only access fluid minerals from under a site from no more than about ½ mile away, so what cultural sites have been identified within the Field Office which are about 1 mile in size? Also, are there any sites larger than 1 mile? If so, then the analysis should indicate that cultural resource protection may essentially sterilize the minerals in those areas. The state strongly questions the existence of “larger cultural sites” which may be large enough to require directional drilling, and would request that this statement be clarified or stricken.	General information concerning the nature of these sites has been added to Chapter 3.
State of Utah	Forestry and Woodlands	Page 2-55 nor Section 6.8 does the draft provide for commercial cutting of timber outside of the purpose to maintain forest and woodland health. Timber is a multiple use resource and its harvest should be provided for on a sustained yield basis not just for management purposes.	Timber harvest would be allowed on a case-by-case basis until a Forest and Woodland Management Action Plan is developed. The plan would address sustained yield.
State of Utah	Lands and Realty	The final Plan should allow the flexibility to negotiate exchange terms which meet the needs of both parties. In addition, the state has previously requested that the BLM consider making all lands within the Field Office available for exchange unless there is a specific reason to withhold a tract.	Language has been added to Table 2-16 Lands and Realty related to the BLM giving priority to the State of Utah for land exchanges to resolve inholdings issues.
State of Utah	Lands and Realty	2-17, Land Tenure Adjustments: TLA representatives have been working with the BLM and have suggested language that allows for 3 step categories of BLM lands that could be used for exchange. This is more particularly described on Attachment 1.	BLM land exchange categories comply with Federal laws and regulations. Specific consultation and/or coordination procedures will be followed as project level decisions are made. BLM commits to coordinate on the management of public lands within the Price Field Office with other land management agencies, counties, municipalities, and private entities. Regional partnerships and cooperative efforts are welcomed by BLM.
State of Utah	Lands and Realty	2-110 Dry Lake ACEC: Any designation that would be managed as NSO for oil and gas or avoidance for ROW grants must make allowances within those designations for access to Trust Lands.	The BLM would allow access to SITLA plans per the Cotter Decision (See Lands and Realty Table 2-16 of the Proposed RMP/Final EIS). This policy is reiterated in Table 2-22 (common to all alternatives, Transportation and Motorized Access), which states that BLM would allow for reasonable access to non-BLM managed lands within the PFO.
State of Utah	Lands and Realty	4-393 Impacts of Land and Realty decisions on all other resources: It is impossible to determine the impacts of	The impacts of Land and Realty decisions have

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		this section. They are confusing and need further clarification.	been revised and clarified for the Proposed RMP/Final EIS.
State of Utah	Livestock Grazing	2-58 Criteria For Voluntary Relinquishment And Grazing Permits Or Grazing Preferences: Here the DEIS proposes criteria for retiring grazing permits. The terms “retire” and “disposal” depict finality. The proposal here is to end live-stock grazing on lands covered by the retired permit. This is contrary to M-37008 issued by the solicitor for the Department of the Interior.	See GCR 82.
State of Utah	Livestock Grazing	4-51 Impact to Livestock from Soil, Water, and Riparian decisions: There is no mention of the impacts of restricting livestock from these areas by fencing or closures, only the benefits were listed.	The definition of “surface disturbance” in the Glossary of the Proposed RMP/Final EIS has been changed. The analysis of Impacts to Livestock Grazing from Soil, Water, and Riparian decisions has been expanded in the Proposed RMP/Final EIS.
State of Utah	Livestock Grazing	4-273 Livestock Grazing: Throughout this section the retirement of grazing allotments is purported to improve wildlife habitats, reduce erosion, and improve riparian habitats. Elsewhere in this document grazing was proposed as a tool to improve habitats. Nowhere in science does it indicate that livestock grazing is responsible for the impacts listed here. However, poor management of livestock clearly can be the cause of such impacts. Livestock grazing should not be used to justify retirement of AUM so the AUMs can be allocated to other uses. As presented, the impact analysis demonstrates a clear bias against livestock grazing and in favor of recreation and wildlife.	Table 2-14 (Livestock Grazing -Common to All Actions) in the Proposed RMP/Final EIS better explains management of livestock.
State of Utah	Minerals and Energy Resources	To suggest that Alternative B represents a balanced use of resources is to ignore the significant mineral resources and socioeconomic benefits of the Price Field Office Area. The state strongly requests that Alternative B be reworked to reflect a more balanced use of mineral resources in the Field Office Area.	See GCR 18.
State of Utah	Minerals and Energy Resources	The oil and gas development restrictions set out in Appendix 8, under the terms of the preferred alternative, present a formidable scheme of measures to protect various wildlife species. If all of the listed wildlife species are present in a particular area, the restrictions would not allow any exploitation of the mineral resource.	Appendices 8 and 16 of the Draft RMP/EIS have been consolidated and inconsistencies resolved in Appendix G of the Proposed RMP/Final EIS. Also Maps 4-1 to 4-6 have been added detailing the impacts of spatial and seasonal restrictions on oil and gas development.
State of Utah	Minerals and Energy Resources	Coalbed Methane: A new play covering the coals of the Emery Sandstone Member of the Mancos Shale has emerged since the USGS completed its 1995 national oil and gas assessment. The occurrence potential of this new play should be high.	Map 3-20 of the Proposed RMP/Final EIS does not identify specific coalbed natural gas plays but consolidates all of them. This new play does not expand the zone of occurrence of coal bed natural gas. Map 3-20 has been modified to show this area as high occurrence potential.
State of Utah	Minerals and Energy Resources	A coal occurrence map should be prepared similar to those existing maps for oil and gas, CBM, gypsum, sand and gravel, etc., showing the occurrence potential and certainty of occurrence ratings for the various coal areas.	Map 2-56, Coal Available for Further Consideration for Leasing, has been added to the Proposed RMP/Final EIS.
State of Utah	Minerals and Energy Resources	Alternative D, corridors of access to the bottom of Nine Mile Canyon need to be provided to allow collection lines to feed into the main pipeline. We suggest that no surface occupancy lease stipulations should be defined narrowly in this area, perhaps by drawing a 100-foot buffer around the inventoried archaeological sites.	The management prescriptions for the ACEC in the Draft RMP/EIS and the Proposed RMP/Final EIS allow oil/gas infrastucture to support existing leases after cultural clearance (see Table 2-19). The no surface occupancy lease stipulation for Alternative D is based on manageability.

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State of Utah	Minerals and Energy Resources	Appendix 23 states that, BLM prepared a RFD to project environmental impacts through the next 15 year period. However, Appendix 21 states "The RFD projects the number of wells during the next 20 years,…" This time-frame discrepancy needs to be clarified.	The discrepancy in time frames has been corrected in the Proposed RMP/Final EIS. See Appendix M.
State of Utah	Minerals and Energy Resources	On Page 4-317, the Draft suggests closing developed recreation sites to mineral leasing, or using NSO stipulations in the alternative. Developed recreation sites are not that big, so closure for fluid mineral makes no sense.	Developed recreation sites would be recommended for withdrawal from mineral entry but not closed to oil/gas leasing (see Table 2-17 of the Proposed RMP/Final EIS).
State of Utah	Minerals and Energy Resources	ES-4, Reasonable Foreseeable Development; This paragraph fails to mention that there is specific evidence in the form of instruction memorandums that address EPCA and how Reasonable Foreseeable Development (FD) and other related energy issues are to be addressed in the planning process. Surface Disturbing Activities: To apply surface disturbance for oil and gas to all Surface Disturbing Activities (SDA) is not practical.	Appendix M of the Proposed RMP/Final EIS has been further explains why the Proposed RMP/Final EIS does not comply with IM 2004-089.The Draft RMP/EIS was released in July 2004, the same year the IM was released. There was not sufficient time to incorporate the IM in the Draft RMP/EIS. Hence to maintain consistency with the Draft it has not been incorporated in the Proposed RMP/Final EIS. Appendix G explains why oil and gas restrictions apply to all surface disturbing activities.
State of Utah	Minerals and Energy Resources	2-99 NSO: The maps show that in all alternatives there are areas designated as NSO and that due to their size any reasonable possibility of development is impossible. In today's market, economics, technology, equipment availability, and depth of wells, etc. dictates that 1/2 mile is likely outside distance for directional drilling in the resource area. Lands more than 1/2 mile from the nearest open surface are effectively not open to oil and gas operations and should be shown as withdrawn from leasing to present a more accurate record of what is available for oil and gas leasing.	See GCR 52.
State of Utah	Minerals and Energy Resources	2-103 Management of WSA lands if Released by Congress: If lands are released from wilderness consideration because they don't meet wilderness criteria. Subsequently, these lands should not be managed as wilderness but should return to the multiple-use sustained yield standard.	The Proposed RMP/Final EIS indicates that should any WSA, in part or in whole, be released by Congress from wilderness consideration, proposals in the released area would be examined on a case-by-case basis for consistency with the goals and objectives of the RMP decisions. When appropriate, a land use plan amendment or amendments may be initiated.
State of Utah	Minerals and Energy Resources	In short, the Draft RMP/EIS falls short of analyzing the impacts of the establishment of NSOs and the capability of directional drilling in these areas and the recoverablity of the mineral resources in them.	See GCR 52.
State of Utah	Minerals and Energy Resources	The analysis in Chapter 4 of the Draft RMP/EIS is inadequate with respect to the impacts of ACECs on oil/gas development.	The impact of ACECs on oil/gas development has been augmented in the Proposed RMP/Final EIS.
State of Utah	Minerals and Energy Resources	Tables 4-3 to 4-7, Acres In The Development Area: They fail to disclose the impacts on oil and gas development in high potential areas and only disclose impacts in developed areas.	In the Proposed RMP/Final EIS these tables show VRM Class acres in high and low oil and gas potential areas.
State of Utah	Minerals and Energy Resources	4-419, Minerals Assumptions: To assume that all mineral development would occur north of Highway 10 and 6 is a false assumption and not based the mineral potential report. 4-419, Significance Criteria: In the first two bullets it provides that 15% of the land available must be impacted before impacts are significant.	The majority of the well pads contained in the RFD are in the Book Cliffs and Tavaputs areas which are north of Highways 10 and 6. In the Proposed RMP/Final EIS the significance criteria have been

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		4-423 Impact To Mineral and Energy: Here the DEIS reports that approximately 1/4 of a million acres would be closed within the known oil and gas reserve area with no mention of impacts. 4-435: The acres assigned here do not match the same tabulation presented in Chapter 2 on Page 2-99. 4-439: Here it states that there will be no impact to cultural resources on over 701,90 acres. One would assume it to be the total of oil and gas closed areas and NSOs, but it is not.	removed but are listed as assumptions for analysis. The number of acres closed to oil and gas leasing (including those in WSAs) are accounted for in Table 4-17 of the Proposed RMP/Final EIS. The differences in reported numbers of acres have been rectified in the Proposed RMP/Final EIS.
State of Utah	Minerals and Energy Resources	4-472 WSAs, The Tavaputs Plateau: It is used here to describe impacts to wilderness from valid existing rights.	According to the BLM's Wilderness IMP, oil and gas leases which existed before the WSAs were designated may be developed even if wilderness character is impaired. There would be impacts to wilderness character if valid existing oil and gas leases are developed.
State of Utah	Minerals and Energy Resources	Appendix 23 acknowledges Bureau direction regarding integration of the Energy Policy and Conservation Act analysis into the planning process. However, the EPCA data is not readily discernible at the indicated locations.	See GCR 52.
State of Utah	Minerals and Energy Resources	In general, the Draft RMP and the associated mineral report correctly identify the occurrence of the energy and mineral commodities in the Price Field Office planning area, but significantly underrate the energy and mineral development potential of the planning area.	See GCR 51.
State of Utah	Minerals and Energy Resources	4-526 Coal: The document states that no reasonable and foreseeable coal development areas are in the ACEC. Map 3-19 indicates this area as potential coal reserves. The analysis fails to address why the development of these reserves is not reasonable or foreseeable, then analyze the impact.	Map 3-25, Coal Reserves, has been added to the Proposed RMP/Final EIS. No ACECs overlap coal reserves.
State of Utah	OHV Route Identification	2-86, OHV Recreation Alt. D: There are no open OHV areas shown on the maps and no acreage assigned to open use. The acreages open to limited use is overstated. Only land along designated routes is open 300' on each side. Beyond that, the lands are closed and the acreage figures and maps should reflect this. Massive closures of land formerly open to OHV use will increase use and impacts on Trust Lands.	Cross country travel by motorized vehicles is only allowed in the "no action" alternative. Trust lands should not be impacted by that decision since they are not "open" either. Travel is limited to existing roads and trails on those parcels. There is no 300 foot open corridor on either side of a designated route. OHVs are limited to those designated routes. Maps and analysis in the Draft RMP/EIS were inadequate as far as OHV routes were concerned. The Proposed RMP/Final EIS has been updated.
State of Utah	Process and Procedures	The state believes that it is possible to convey information in a more succinct and comprehensible manner than this large format.	The Proposed RMP/Final EIS has been reformatted and edited to improve the documents clarity and reader understanding.
State of Utah	Process and Procedures	The State expects BLM's RMP to be consistent with all state laws, and the plans and ordinances of local governments, to the fullest extent that the state and local provisions are not directly contravened or preempted by federal law.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical

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			(FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. See GCR29.
State of Utah	Process and Procedures	The state expects that the BLM, through its planning efforts, will develop management and disclose impacts to school trust lands.	The impact analysis has been augmented in Chapter 5 of the Proposed RMP/Final EIS disclosing the impacts of BLM decisions on school trust lands. Language has been added to Chapter 2 related the desire to exchange lands with the State of Utah.
State of Utah	Process and Procedures	The state is concerned about the cumulative impact of the various tools available to the BLM for management prescriptions within the Price RMP. Appendix 24 discusses the issue, but misses the point entirely. The state recognizes that each of the programs and responsibilities of the BLM bring the need for related management prescriptions. The state expects that the needs of each program are brought into the Final proposed management mix, from which the final plan is derived. However, the state also expects that the management requirements for each program will be designed to support the primary resource uses for the area.	See GCR 37. Goals and objectives are presented in Chapter 1 of the Proposed RMP/Final EIS. The ROD will explain BLM's rationale for the Final RMP.
State of Utah	Process and Procedures	The state is further concerned that the relationship among Special Recreation Management Areas, Recreational Opportunity Spectrum and Visual Resource Management Areas has not been fully explained or clarified. The state believes that BLM should only employ the most focused tool possible to protect the resource of interest. If BLM proposes to establish an SRMA containing ROS categories "primitive," or "semi-primitive non-motorized," the need for other management tools is minimal.	See GCR 37.
State of Utah	Process and Procedures	The state is concerned that the proposed RMP does not make decisions about the management necessary for particular areas, in favor of retaining vagueness through multiple designations. For example, on page 4-587, impacts from proposed ACEC designations and WSR studies are discussed. No conclusion is reached, only the statement is made that "whichever management options are more protective of the values of concern would take precedence." This is management by sledgehammer. The statement demonstrates BLM cannot even determine the effects of its own management prescriptions, What resources are to be protected, and what management scheme is necessary? Also, on page 4-314, under the "Impacts to Visual Resource" section, the analysis states that the "use of the ROS within SRMAs would assist in meeting the objectives for VRM classifications." What does this mean? Is the need for each tool being examined on its own merits? Or is BLM just lumping everything together into alphabet soup? The state requests the BLM refine the management scheme to protect or use the resources in question, and choose the right scalpel, so the public and resources users can understand what is expected of them.	In the Proposed RMP/Final EIS each resource decision or allocation is analyzed to disclose the impacts on other resources and uses.
State of Utah	Process and Procedures	4-311 Recreation: Throughout this section there are proposed restrictions that, if implemented, will impact SITLA lands by increasing their use to escape more restricted use on BLM lands. Example: the closure of the majority of the BLM lands to open OHV use. These impacts to SITLA land must be analyzed. 4-317 Impacts To Livestock: Here the analysis indicates that no impacts are anticipated. However, the next analysis, which is recreation, discusses the impacts of closing developed sites to grazing. This is an inconsistency. The same problem exists with respect to minerals. NSO and closures are discussed in the recreation analysis with no disclosure or analysis of the impact on minerals and energy.	The Proposed RMP/Final EIS anyzes impacts to SITLA lands and and includes an expanded analysis of impacts on mineral exploration and development base on an updated RFD. See GCRs 49, 51 and 132.
State of Utah	Recreation	There are inconsistencies between ROS inventory designations and the existing San Rafael Travel Plan around Horse Valley and Baptist Draw.	See GCR 50.
State of Utah	Recreation	The management alternatives for the High Use areas in the San Rafael SRMA are in direct contradiction of the	See GCR 50.

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		management prescriptions of the ROS for these same areas. A solution to some of these contradictions would be to review the ROS designations and draw them so that they reflect the high use that is already occurring in some areas, and to recognize the need for a stronger management presence. Some of the Roaded Natural designations could be expanded to allow the management techniques specified for High Use areas.	
State of Utah	Recreation	The state is concerned with the lack of background on the proposed designation of SRMAs. The state would like to see a discussion demonstrating the necessity of each SRMA, the relationship with existing recreation plans. Desolation Canyon has a management plan in place for recreational activities in the Canyon, Formulation of a SRMA is not necessary to accomplish this goal. Recreation and river corridor management for the Desolation Canyon should be managed according to the provisions of the existing Desolation and Gray Canyons of the Green River, River Management Plan. The state also questions the large proposed SRMA for Nine Mile Canyon, The Nine Mile area could be managed according to the 1995 Recreation and Cultural Area Management Plan.	See GCR 107.
State of Utah	Recreation	The unvarying nature of the alternatives, coupled with a lack of discussion for the need and authority to create SRMAs concerns the state. The state feels the PF0 has neglected to adequately weigh its options in relation to recreation management, and has failed to weigh recreation uses against other laud uses in the area. The alternatives do not represent a balanced discussion of the multiple uses of the area. Also, there is no clear line drawn between SRMA and. ROS, as evidenced by their union in the maps section (Maps 2-17 to 2.21.). This creates a problem for several reasons. For example, if all aspects of the Preferred Alternative were adopted, the SRMA areas designated in the Preferred Alternative (Map 2-21) would have ROS management prescriptions in conflict with the Preferred Alternative Off-Highway Vehicle Recreation management prescriptions as represented in Map 2-16 and with the Preferred Alternative for High Use Areas as represented in Map 2.25. As noted above, the designation of “high use” seems a direct contradiction of the designation of these areas in the ROS as “Primitive” (P) and “Semi-Primitive Non-Motorized” (SPNM) which in fact are defined as “low use” areas.	See GCR 50.
State of Utah	Recreation	2-82, Nine Mile Canyon SRMA: How does SPNM affect access to oil and gas locations? A classification of SPNM could be in conflict with a VRM III viewshed and should be modified to meet the VRM class.	The BLM would attempt to maintain the opportunity within the SPNM ROS Class within the Nine Mile Canyon SRMA. This could be accomplished by directional drilling, use of temporary roads, gating roads to allow administrative access only, minimizing trips to the well, etc. There is no inherent conflict between VRM Class III and ROS SPNM.
State of Utah	Recreation	2-104, Management of Desolation Canyon, Turtle Canyon, Jack Canyon: These alternatives propose to manage areas as part of Desolation SRMA without analysis of need or disclosure of impacts.	See GCR 107.
State of Utah	Socioeconomics	The state is concerned by the failure of the Draft RMP to reflect economic impacts, either positive or negative, in any of the alternatives.	See GCR132. A discussion of the social make-up of Emery and Carbon Counties has been added to Section 3.6 of the Proposed RMP/Final EIS. Additional social concepts including prehistory, settlement patterns, history, culture, and traditional values are provided. An appendix has been added summarizing the results of the Utah State University public lands survey commissioned by the Governor’s office.

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			Section 4.6 of the Proposed RMP/Final EIS has also been reanalyzed using the IMPLAN model to determine impacts including the economic contribution (i.e. jobs, income, tax revenues, etc.) of energy production, recreation, and grazing on BLM lands for Emery and Carbon counties. An additional socioeconomic technical report has been provided which explains the methodology used to analyze the socioeconomic impacts from having access to BLM lands for multiple uses (Booz Allen 2008a). 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect industries (trucking, lodging, etc.). Section 3.6 of the Proposed RMP/Final EIS has been updated to include an assessment of public finance and government services from having access to BLM lands for multiple uses. This includes an analysis of how BLM lands and federal mineral estate managed within Emery and Carbon Counties affect local, state, and federal government budgets and expenditures from mineral royalties, taxes, Payment in Lieu of Taxes, fees and other revenues. A discussion of potential impacts to public finance and government services from mineral revenues under each alternative has been added to Chapter 4, Section 4.6.
State of Utah	Socioeconomics	The Draft RMP also fails to recognize the socioeconomic importance associated with the development and use of water resources in the Price Field Office area. Recent federal-funding-assisted irrigation projects within Emery County have involved approximately seventy-five million dollars. Projected future projects total approximately one-hundred million dollars. Wild and Scenic Rivers designations have the potential to impact federally funded water-related projects. The Baseline Socioeconomic Profile (August 2003) and the Draft RMP/EIS are inconsistent.	The ongoing water projects in Emery County have been added to the list of projects and considered in the “Cumulate Impacts”, Section 4.7 of the Proposed RMP/Final EIS. The 1994, Public Law 98-569 amended the Colorado River Basin Salinity Control Act and directed the Secretary to develop a comprehensive program for minimizing salt contributions from lands

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			administered by BLM and to provide a report on this program to the Congress and the Advisory Council. BLM's Colorado River Basin Salinity Control program is designed to provide the best management practices (BMP) of the basic resource base. Successes with the resource base will translate to improved vegetation cover, better use of onsite precipitation, and stronger plant root systems. In turn, a more stable runoff regime and reduced soil loss should result, thus benefiting water quality of the streams in the Colorado River Basin including the Green River and San Rafael River. In Section 1(b) of the Wild and Scenic Rivers Act, Congress states that one of the objectives of the Act is to protect the water quality of designated rivers. Congress further specified that the river-administering agencies cooperate with the EPA and State water pollution control agencies to eliminate or diminish water pollution (Section 2(c)). Comparing the two, it is clear that the Wild and Scenic Rivers Act and the Colorado River Basin Salinity Control Act are not only complementary of one another, but share the same objective with regard to water quality. The Wild and Scenic Rivers Act directs the Secretary of the Interior or any government agency to prohibit any loan, grant, license, or otherwise construction of any water resources project that would have a direct effect on the values for which such river designation was established. The law also states that it cannot preclude licensing of, or assistance to, developments below or above a wild, scenic, or recreational river area or on any stream tributary thereto that will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the National Wild and Scenic Rivers System. However, projects intended to comply with the Colorado River Salinity Control Act are those that would generally benefit stream segments instead of affecting or unreasonably diminishing its values including water quality.

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			The BLM is fully evaluating and considering potential impacts related to these Wild and Scenic River decisions in this planning process. Congressional designation of suitable streams is evaluated in the cumulative impacts analysis of the Final EIS, and Appendix C is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river. A new socioeconomic technical report was prepared in 2008 which replaces the 2003 baseline report (Booz Allen 2008a). The report 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect industries (trucking, lodging, etc.). This 2008 report was the basis for the preparation of Section 4.6 of the Proposed RMP/Final EIS.
State of Utah	Socioeconomics	The inconsistencies between the baseline profile and the Draft should be reconciled, and the Socioeconomics section of Chapter 4 should be revised to present a detailed analysis of social and economic consequences of implementing the various alternatives, for each community in the Price Field Office area, in such a Manner that the information can be clearly understood.	A new socioeconomic technical report was prepared in 2008 which augments the 2003 baseline report (Booz Allen 2008a). The new report 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect

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			industries (trucking, lodging, etc.). This 2008 report was the basis for the preparation of Section 4.6 of the Proposed RMP/Final EIS.
State of Utah	Socioeconomics	The Draft RMP should, but fails to, clearly address the economic value of mineral development in order to weigh such value against other possible resource uses.	The Proposed RMP/Final EIS, Section 4.6 has been revised and the IMPLAN model used to evaluate the socioeconomic impacts. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. Also see GCRs 51, 132 and 133.
State of Utah	Socioeconomics	3-59 Socioeconomics: This section fails to acknowledge the dependency of SITLA on the income they receive from development and use of lands in the resource area. It also fails to address the dependency of county governments on revenue shares of royalties and taxes concentrated in the resource area.	A discussion of the potential fiscal impacts to state and local governments has been added to Chapter 4, section 4.6. Also see GCR132.
State of Utah	Soil, Water and Riparian	The Draft RMP fails to recognize comments submitted by the state in previous reviews. Specifically, the state, through the Division of Water Resources, previously informed the BLM of three potential reservoir sites which are not considered in the Draft. Two of the sites are located on the Price River (Section 31, T18S, R16E and Section 22, T17 S, R13E), and one site is located on the San Rafael River, (Section 35, T19S, R9E). The potential reservoirs named Woodside and Cat Canyon would conflict with WSAs, ACECs, and potential WSR. segments. For example, the potential reservoir at Woodside would conflict with the Desolation Canyon Wilderness Study Area in all alternatives. Because the requirements for water storage sites are very specific, few satisfactory locations are left to store significant amounts of water. The state requests that, at the very least, the potential reservoir sites should be evaluated in the alternatives.	Appendix C in the Proposed RMP/Final EIS considers the three potential reservoir sites identified by the Utah Division of Water Resources in determining the suitability of the Price and San Rafael River segments for inclusion in the Wild and Scenic National River System.
State of Utah	Soil, Water and Riparian	2-2 & 3, Water; Insert a bullet that states, " Provide reasonable access and do not interfere with water rights of others when that right requires access on or across BLM land within the PFO."	43 USC section concerning the access and water rights will be observed; as will the results of Hage vs US. Further, 16 USC 3210 requires BLM to provide access to private properties surrounded by public land.
State of Utah	Soil, Water and Riparian	4-30, Soils, Water and Riparian Assumptions: The assumption listed here is that "Substantial disturbances of soil, including compaction and loss of vegetation,…". Oil and gas development is usually listed as the mjajor contributor to the impact. Table 4-2 which lists an initial disturbance of 11.576 acres (0.0046%) disturbed during the life of the plan for Alternative D. Do you agree with these calculations?	The estimated total acreage disturbed from oil and gas under Alternative D from the Draft RMP/EIS Table 4-2 is 17,248 acres or 0.7 %.
State of Utah	Soil, Water and Riparian	4-53, Impact To Transportation and Motorized Access from Soil, Water, and Riparian Decisions: The impact analysis wording here is not consistent with the alternative in the Matrix, Pg. 2-29.	See GCR 72.
State of Utah	Special Status Species	Prior to implementing any management actions, the state suggests, the BLM ensure the actions it would be implementing are appropriate and specific to currently known habitats or populations of special status species.	See GCR 65.
State of Utah	Special Status Species	4-150, Significant Criteria, Special Status Species: Here the Draft RMP/EIS provides that "Any surface disturbance and/or human activity in potential occupied or designated habitats…with the USFWS". This is inconsistent with the requirement of the Endangered Species Act and Implementation regulations.	This statement is an assumption for analysis of special status species. The BLM will comply with the requirements of the T & E Act if any habitat maybe affected.
State of Utah	Transportation and Access	Map 2-52 in the RMP, showing the Transportation Utility Corridors for the preferred alternative, does not include a corridor down Nine Mile Canyon where an existing 20-inch Questar Pipeline Company natural gas pipeline runs.	Map 2-52 of the Draft RMP/EIS shows an alternative routing of the gas pipeline that was not in Nine Mile Canyon as shown for the other alternatives. A corridor was provided for a natural

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			gas pipeline between Price and Vernal. This is shown on Map 2-54 in the Proposed RMP/Final EIS.
State of Utah	Transportation and Access	The state believes it is critical to keep access roads open to facilitate paleontological investigations, as both dinosaur and microvertebrate sites are nearly impossible to be studied scientifically if sites are more than a mile from an access point. On page 4-524, the Draft indicates that the proposed. ACECs would “cause significant impacts” to the ELM”s ability to issue rights-of-way and other permitted activities. The state requests that this statement be clarified, explained and justified.	The BLM may grant administrative access through a permit for paleontological research even if the area is closed to recreational OHV activity. The Impacts of ACECs on ROWs has been clarified in Section 4.3.4 of the Proposed RMP/Final EIS. ACECs can create areas of exclusion and avoidance for ROWs.
State of Utah	Transportation and Access	2-3, Vegetation: Insert bullets regarding the Range Land Health standards and manage and restore the shrub-steppe and Great Basin Sagebrush ecosystems.	See GCR 11.
State of Utah	Vegetation	2-3, Vegetation: Insert bullets regarding the Range Land Health standards and manage and restore the shrub-steppe and Great Basin Sagebrush ecosystems.	See GCR 162.
State of Utah	Vegetation	2-31, Sage Brush: See previous comment on pg. 2-3, 2.2,3. This alternative provides for management of sage brush but not its restoration. Restoration of the sagebrush steppe should be provided for.	See GCR 162.
State of Utah	Visual Resources	The state objects that the Draft RMP does not make information supporting the VRM inventory class determinations proposed by BLM available for review. The state is further concerned that the rationale for each VRM management class is not presented, nor is the impact on resource uses fully disclosed in the analysis of impacts. The state is concerned that the BLM's identification of VRM inventory classes has lead to a self-effectuating class protection scheme, rather than a source of information to be considered within the proposed resource use allocation schemes within each of the Draft Plan's Alternatives.	See GCR 135.
State of Utah	Wild and Scenic Rivers	The documentation in Appendix 3 of the Draft RMP/EIS of Outstandingly Remarkable Values is inadequate to justify the eligibility determinations. The descriptions of values, found in Table 3 of Appendix 3, do not support the determinations of eligibility presented in Table 4 of the Appendix. Regarding suitability, the Draft fails to address three potential reservoir sites identified by the Utah Division of Water Resources. Two of the sites are located on the Price River (Section 31, T18 S, RI 6E and Section 22, T17S, R13E), and one site is located on the San Rafael River (Section 35, Tl9S, R9E). The state is concerned that not all “eligible” segments meet the free-flowing criteria; nor is it, “clearly demonstrated that water is present and flowing at all times.”	Table C-3 of Appendix C of the Proposed RMP/Final EIS has been modified to better demonstrate that the outstandingly remarkable values are rare, unique, or exemplary and significant on at least a regional level. Appendix C is also modified to more clearly explain how the region of comparison was identified and used to determine which values are at least regionally significant. On the issue of a stream’s flow, there are no specific requirements concerning minimum flow for eligible rivers. Flows are considered sufficient if they sustain or complement the outstandingly remarkable values for which the stream would be designated. However, none of the streams determined to be eligible (see Appendix C, Table C-4) are considered “dry washes” or ephemeral steams which flow only in direct response to precipitation or have channels above the water table at all times. The BLM does include in the inventory of eligible rivers intermittent streams which have interrupted flow regimes or

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			flow seasonally. Intermittent streams should not be automatically precluded from further consideration as a Wild and Scenic River based solely on their limited flow. Streams representative of desert ecosystems should also be considered for inclusion. Appendix C is further modified to provide a more thorough discussion of how the suitability factors are applied to each eligible river, including consideration of the three potential reservoir sites identified by the Utah Division of Water Resources.
State of Utah	Wild and Scenic Rivers	The state is concerned that the No Action Alternative identifies as eligible and proposes protective management of all eligible river segments. One alternative shall provide for no suitablity determination. The range of alternatives in the Draft fails to meet this requirement.	BLM Manual 8351.33C provides guidance for considering suitability in the range of alternatives. It specifies that “the no-action alternative, should provide for on-going management, including continuation of protective management of eligible segments.” It is the BLM’s policy to manage and protect the free-flowing character, tentative classification, and identified outstandingly remarkable values of eligible rivers. Alternative A of the Proposed RMP/Final EIS has been changed, meeting the BLM manual requirement to provide an alternative where none of the eligible streams would be managed as suitable.
State of Utah	Wild and Scenic Rivers	2-131, Wild and Scenic Rivers, Common to All: The wording here must be changed to read, “line of site up to 1/4 miles”. At the end of the paragraph it provides that specific management for each classification is outlined in Appendix 22. No such appendix is listed in the table of contents. Management is not outlined in Chapter 2, Page 2-19, Common To All.	The Wild and Scenic Rivers Act does not define the river area as “[line-of-sight] up to ¼ miles.” The Act does, however, define the river study area as a minimum of “that area measured within one-quarter mile from the ordinary high water mark on each side of the river” (Section 4(d)). The analysis of cumulative impacts in the Proposed RMP/Final EIS has been modified to more carefully consider effects of congressional designation. Appendix C also includes a discussion of how rivers may be managed per each tentative classification. The discrepancy regarding the reference to Appendix 22 is corrected.
State of Utah	Wild and Scenic Rivers	4-556, Wild and Scenic River Impacts: The impact analysis was completed with unknown or undisclosed management stipulations.	Management prescriptions for Wild and Scenic Rivers has been added to Table 2-20 of the Proposed RMP/Final EIS.
State of Utah	Wild Horses and Burros	Chapter 4 Wild Horses: There is no analysis of impacts to other resources in this section.	Impacts from wild horse decisions on other resources has been added to the Proposed RMP/Final EIS.
State of Utah	Wilderness	The state questions the need for designation of WSAs as VRM Class I.	See GCR 115.

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State of Utah	Wilderness	Section 1.6.14 is misleading and not consistent with the settlement in Utah v. Norton and directives related to it. A brief description of the settlement terms should be in the opening paragraph of this section. This would provide the reader with an answer to why the BLM won't consider designations of new WSAs in the RMP process.	A brief description of the Utah v. Norton settlement agreement can be found in Chapter 3, Section 3.2.11 of the Proposed RMP/Final EIS.
State of Utah	Wilderness	1-12, Wilderness Study Areas: Delete the last sentence of the paragraph, It provides that the RMP will set objectives for management of visual resources and OHVs in the WSAs and ISAs. Management of these resources is directed by the interim management plan for the area and are the management standard.	While the IMP contains direction for how WSAs should be managed, it does not make OHV and VRM designations. Only land use plans are able to make area designations, and as such, the OHV and VRM decisions are merely implementing BLM policy as stated in the IMP and other policy.
State of Utah	Wilderness	4-472 WSAs, Method Of Analysis: Here it provides that impact to resources and resource use was not addressed. However, this section goes on to discuss impacts to WSA from VRM and OHV use. In short, impacts to other resources was not analyzed because they were in the FEIS but impacts to wilderness characteristics were analyzed.	The impacts from designation of WSAs were discussed in the Wilderness Final EIS. However, the RMP is affirming decisions related to WSAs being VRM Class I and closed to OHV use. Therefore, these impacts are discussed in the Proposed RMP/Final EIS.
State of Utah	Wilderness	4-477, Impacts To Wilderness: The alternative presented seems to manage the lands released by Congress as wilderness without the specific designation. If they do not have wilderness characteristics, the lands should be managed under multiple use. 4-478, Release Of Horseshoe Canyon: Here again a released WSA is proposed to be managed as part of SRMA. Map 2-44 through 2-46 indicates that this area is in a proposed ACEC which is not proposed in the alternative nor the analysis.	See GCR 112.
State of Utah	Wilderness	4-479, Impacts To Wilderness Characteristics: The analysis here implies no routes would be designated in this area implying this area may be NSO. This adds to the possibility that an ACEC was proposed but has been omitted. (See above comment.).	The impact analysis for WSAs if released by Congress has been updated in the Proposed RMP/Final EIS.
State of Utah	Wilderness	In the last paragraph the reader is referred to IM 2403-275, Change One, for a definition of wilderness characteristics. This IM clearly states that wilderness characteristics are features of land associated with the concept of wilderness. If one adheres to this definition, it is easier to understand that either land has these characteristics or it doesn't. To properly establish how wilderness characteristics are to be addressed, the third paragraph should be moved up to become the first paragraph because it establishes how and to what extent wilderness characteristics will be addressed. This section clearly defines protections that may be applied but seems to ignore the requirements in IM 2003-275, Pg. 2 of 7 Policy/Action where It states “the BLM will involve the public in the planning process to determine the best mix of resource use and protection consistent with multiple-use and other criteria established with FLPMA and other applicable law, regulation, and policy.” This section fails to accurately portray what wilderness characteristics are and misstates how they are to be addressed in this document.	See GCR 116.
State of Utah	Wilderness	The state objects to a separate discussion of wilderness characteristics outside the discussions related to ACECs, SRMAs and the like. Only in those discussions can the advantages and limitations of each management tool, and the balancing of resources necessary to the final plan, be discussed. The state requests all discussion of wilderness characteristics be properly presented in a discussion of each management tool in the final plan.	See GCR 108.
State of Utah	Wilderness	The Glossary definition relates wilderness characteristics more closely to the definition of “wilderness character” as defined by the Wilderness Act. of 1964, than relating the definition to that contained in IM2003-275, Attachment 1, The state recommends that this section and the definition in the Glossary be rewritten to more accurately represent the Settlement Agreement and the “Instructions” given in IM2003-275.	The concept of wilderness is codified in the 1964 Wilderness Act. As such, the glossary definition is in compliance with both IM-2003-275 as well as Utah v. Norton settlement that states “the term

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			'wilderness character' is used to refer to the necessary collective characteristics or features of wilderness as defined in the Wilderness Act of 1964" (footnote 1, page 2).
State of Utah	Wilderness	1-12 Non WSA Land With Or Likely To Have Wilderness Characteristics: "Or likely to have" should be struck from the title of this section. Neither the settlement nor TM 2003-2.74 or IM 2003-275 provides for the management of such land to preserve some or all of these values as presented in the first paragraph. In the last paragraph the reader is referred to IM 2003-275, Change One, for a definition of wilderness characteristics. Here it is clearly stated that wilderness characteristics are features of land associated with the concept of wilderness. If one adheres to this definition, it is easier to understand that either land has these characteristics or it doesn't. To properly establish new wilderness characteristics are to be addressed, the third paragraph should be moved up to become the first paragraph because it establishes how and to what extent wilderness characteristics will addressed. This section clearly defines protections that may applied but seems to ignore the requirements in IM 2003-275, Pg. 2 of 7 Policy/Action were it states "the BLM will involve the public in the planning process to determine the best mix of resource use and protection consistent with multiple-use and other criteria established with FLPMA and other applicable law, regulation, and policy." This section fails to accurately portray what wilderness characteristics are and misstates how they are to be addressed in this document. Consider rewriting this section.	Please see GCRs 108 and 116.
State of Utah	Wilderness	1-12 Non WSA Land With Or Likely To Have Wilderness Characteristics; This section fails to address the settlement in Utah v. Norton. A brief description of the settlement terms should be in the opening paragraph of this section.	See GCR 146.
State of Utah	Wilderness	VRM, ACEC, SRMA, ERMA, etc. should not be used to manage BLM lands for wilderness characteristics to the exclusion of all the other resource values present.	Please see GCRs 36 and 156.
State of Utah	Wildlife and Fish	The state reminds the BLM that wildlife species fall under the jurisdiction of the State of Utah, and many BLM, state and private lands contribute not only to better health of the environment, but also to the state and local economies. Only by cooperatively managing the species, the habitat, and the needs of humans, can wildlife and the local economy thrive in Utah.	See GCR 8.
State of Utah	Wildlife and Fish	The state has identified major areas of concern with Appendices 8 and 16 There appear to be numerous contradictions between the information provided in Appendix 8 and the information provided in the text of the Draft RMP/EIS.	Appendix 8 and 16 of the Draft RMP/EIS have been revised and clarified to remove inconsistencies and are combined in Appendix G of the Proposed RMP/Final EIS. Also waiver, exception, and modification criteria have been added to each of the restrictions.
State of Utah	Wildlife and Fish	Wording on pg, 2-58 seems to indicate that some type of reallocation may be made during the life of the plan without amending the plan. The state requests modification of the definition of an "Active Raptor Nest its"' (pg. 7-1). The state would like to maintain the ability to introduce non-native species, namely sport fish and chukar partridge, within the Field Office area.	The Section related to "voluntary relinquishmet" has been removed from the Proposed RMP/Final EIS. The definition of "Active Raptor Nest" in the Glossary of the Proposed RMP/Final EIS has been modified. Table 2-8 of the Proposed RMP/Final EIS allows for the introduction of non-native fish species and naturalized wildlife species.
State of Utah	Wildlife and Fish	Page ES-2 (Planning Issues) states that there are eight planning issues to be addressed, and then goes on to list sixteen issues. The state also suggests changing the wording on page 4-8, from "Gordon Creek Wildland Management Area" to "Gordon Creek Wildlife Management Area."	The Executive Summary has been completely rewritten and now focuses on the Proposed RMP and not the planning issues raised during scoping.

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			"Gordon Creek Wildland Management Area" has been changed to "Gordon Creek Wildllife Management Area" throughout the Proposed RMP/Final EIS.
State of Utah	Wildlife and Fish	There are stipulations in Appendix 16 that are not listed in Appendix 8, in Chapter 2, or analyzed in Chapter 4. The section should be analyzed to determine if other such problems exist.	Appendix 8 and 16 of the Draft RMP/EIS have been revised to remove inconsistencies and combined into Appendix G in the Proposed RMP/Final EIS. Information from the updated sage grouse plan has been incorporated into the RMP/EIS.
State of Utah	Wildlife and Fish	2.7.7, Sage-Grouse Plans: A provision should be added to this paragraph that provision of future local Sage-Grouse plans would be incorporated when it is finalized. The UDWR strategic management plan and national MOV on Sage-Grouse, both of which were developed with BLM participation, call for the development of local plans.	See GCR 160.
State of Utah	Wildlife and Fish	4-155, Fish and Wildlife: This section fails to address the cumulative impacts of closures. The DEIS does not have a map of fawning and calving areas for deer and elk.	Seasonal restrictions on oil and gas exploration are shown on Maps 4-1 to 4-6 of the Proposed RMP/Final EIS. Map 3-12a shows the fawning and calving habitat for deer and elk. Restrictions and habitat have been considered in the analysis of environmental consequences.
State of Utah, Office of the Attorney General	Socioeconomics	The DEIS is defective under NEPA for failing to adequately consider the socio-economic impact resulting from Grazing AUM reductions.	See general comment responses #132 and #133
State of Utah, Office of the Attorney General	ACEC	ACECs must not be used as de-facto wilderness management. The ACECs must be limited in size and programmatic scope to only those which are necessary to protect and prevent irreparable damage to relevant and important values. ACEC should not be used to preserve "scenic or recreational values".	See general comment responses #141 and #156. 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. Additionally, the management prescriptions for the ACECs is limited in scope to protect the relevant and important values, and the BLM maintains that the size of the ACEC areas is appropriate for protection of the relevant and important values identified. Appendix L of the Proposed RMP/Final EIS does not include recreation values and opportunities as potential ACEC relevant and important values.

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State of Utah, Office of the Attorney General	Forestry and Woodlands	The RMP must provide for thinning out of old growth to curb insect infestations, as provided in the Bush Administration Healthy Forest Initiative.	Please see general comment response #97
State of Utah, Office of the Attorney General	Livestock Grazing	The voluntary relinquishment criteria listed at 2-58 of the DEIS bear little if any rational connection to a most important core issue, namely: whether the forage will still support grazing.	The voluntary criteria contained in the Draft RMP/EIS has been changed in the Proposed RMP/Final EIS to be consistent with BLM policy. The policy is detailed in "livestock grazing" under Table 2-14. Also see general comment response #82.
State of Utah, Office of the Attorney General	Livestock Grazing	The DEIS should recognize and uphold the preference given to domestic grazing above other forage uses in Taylor Grazing Act grazing districts. The primary vegetation management goal in Taylor Grazing Act Grazing Districts must be to enhance rangeland health to support the maximum number of domestic livestock AUMs at historic levels, in recognition of the preference given to domestic grazing above other forage uses in Taylor Grazing Act grazing districts. The DEIS is contrary to law to the extent it strays from this principle.	Please see general comment response #83
State of Utah, Office of the Attorney General	Minerals and Energy Resources	Gordon Creek WMA – The RMP should not close this area to leasing under valid and existing oil and gas leasing and development rights.	See general comment response #110. Pages 1-2 and 1-6 of the Draft RMP/EIS clearly state that the plan will recognize the existence of valid existing rights. The Gordon Creek WMA is closed to future oil/gas leasing at the request of the UWDR.
State of Utah, Office of the Attorney General	Minerals and Energy Resources	Oil and gas RFD planning scenarios in the DEIS must assume that all potentially productive oil and gas areas are open to standard leasing, as required under BLM WO Instruction Memorandum No. 2004-089.	See general comment response #51. Appendix M of the Proposed RMP/Final EIS has been revised to clarify why this plan does not comply with IM 2004-089.The Draft RMP/EIS was released in July 2004, the same year the IM was released. There was not sufficient time to incorporate the IM in the Draft RMP/EIS. Hence to maintain consistency with the Draft it has not been incorporated in the Proposed RMP/Final EIS.
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The preferred alternative must not unduly restrict access to public lands for energy exploration and development, as required under Executive Order (EO) 13212 and BLM WO Instruction Memorandum (IM) 2003-234.	Please see general comment responses #18 and #49
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The preferred alternative must use the least restrictive stipulations and conditions necessary to protect against irreparable damage to other significant and important resource values, as required under the Energy Policy and Conservation Act (EPCA) as implemented through BLM IM 2003-233.	Please see general comment responses #18 and #49
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The DEIS should direct that Price FO shall consider in good faith whether to waive, modify, or except mineral lease restrictions when they are no longer necessary or effective, as required under BLM IM 2003-234.	Exception, waiver, and modification criteria are described in Appendix G of the Proposed RMP/Final EIS and in Appendix 16 of the Draft RMP/EIS.
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The DEIS must not allow closure of acres to mineral leasing and development not justified by FLPMA and not in compliance with FLPMA withdrawal procedures.	Any areas closed to leasing would be closed for the protection of other resource values and uses as required by FLPMA. See general comment

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			response #1.
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The DEIS must give a clear accounting breakdown of the acres available for oil/gas leasing by alternative.	Page 2-99 of the Draft RMP/EIS and Table 2-17 of the Proposed RMP/Final EIS summarizes the acres available for oil/gas leasing in each of four categories and by alternative. The corresponding maps display the locations of these areas.
State of Utah, Office of the Attorney General	Minerals and Energy Resources	The DEIS is legally defective for not expressly requiring adherence to Congressional reporting procedures, that must be followed if a principal major use is discontinued on a 100,000 acre or greater tract of land. The DEIS is contrary to law for not following the procedures of FLPMA with respect to areas aggregating five thousand acres or more	The BLM will follow the Congressional reporting procedures for any decision affecting 100,000 or more acres. The 5,000 acres is related to lands withdrawn from locatable mineral entry. The Proposed RMP would recommend a total of 92,700 acres be withdrawn from mineral entry, as shown on Map 2-39, in addition to the 328,600 acres already withdrawn. As outlined in FLPMA, additional steps are required to complete the withdrawal.
State of Utah, Office of the Attorney General	Process and Procedures	FLPMA § 1712(c)(9) mandates that the DEIS Price must be consistent with state and local plans. Under FLPMA §§ 1701(7), 1712(a) and 1732(a), available alternatives must be consistent with and uphold the multiple use mandate of FLPMA.	See general comment response #29.
State of Utah, Office of the Attorney General	Process and Procedures	It is contrary to FLPMA and other legal provisions for BLM to purport to establish Special Recreation Management Areas (SRMAs), Recreational Opportunity Spectra (ROS), Recreation and Public Purpose (R&PP) areas and the like, because whether alone or combined, they violate the multiple use, sustained yield mandate of FLPMA.	The BLM "Land Use Planning Handbook, Appendix C" allows for the creation of SRMAs. “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, OHV use and recreation, as well as conserving and protecting other resource values for current and future generations. The DRMP/DEIS contains alternatives which strike an appropriate balance between environmental protection and the use of the resources on our public lands consistent with applicable laws and policies. “

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State of Utah, Office of the Attorney General	Process and Procedures	It is contrary to law for the DEIS to defer important land use planning decisions for later implementation outside the Section 202 Land Use Planning Revision Process.	It is unclear as to which land use decisions the comment is referring. Nonetheless, BLM will involve the public in the planning process to determine the best mix of resource use and protection consistent with the multiple-use and other criteria established in the FLPMA and other applicable laws, regulations and policies. Lands with wilderness characteristics may be managed to protect and/or preserve some or all of those characteristics. This may include protecting certain lands in their natural condition and/or providing opportunities for solitude, or primitive and unconfined types of recreation. The BLM can make a variety of land use plan decisions to protect wilderness characteristics, such as establishing Visual Resource Management (VRM) class objectives to guide the placement of roads, trails, and other facilities; establishing conditions of use to be attached to permits, leases, and other authorizations to achieve the desired level of resource protection; and designating lands as open, closed, or limited to Off Highway Vehicles (OHV) to achieve a desired visitor experience. The BLM also has authority to designate Areas of Critical Environmental Concern (ACEC) where special management attention is required to protect and prevent irreparable damage to important cultural, historic, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.
State of Utah, Office of the Attorney General	Process and Procedures	It is contrary to law for the DEIS to not include in list of recognized resources, the resources of range, timber, minerals, recreation and historic values.(See FLPMA sections 1701(12), 1702(c), 1702(1), 43 CFR 1605.0-5(f))	The Draft RMP/EIS and the Proposed RMP/Final EIS consider and analyze impacts of alternatives on all of these resources.
State of Utah, Office of the Attorney General	Process and Procedures	The RMP transportation plan should be consistent with Carbon and Emery County's transportation plans to the maximum extent allowable under Federal Law, which in this case is 100% consistent as there is nothing about the Carbon and Emery County transportation plans that are inconsistent with Federal Law. The RMP should expressly declare that it will not hamper or interfere with 2477 rights of way. T	A Memorandum of Understanding is already in place demonstrating which roads the BLM and the counties agree on for County System Roads and for BLM System Roads on BLM lands. The MOU has been used extensively in the formulation of designated routes in the RMP. The transportation plans for each county should be consistent with the established MOU. The Proposed RMP/Final EIS

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			does 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 (see Chapter 1, Planning Criteria). Also see general comment response #11.
State of Utah, Office of the Attorney General	Soil, Water and Riparian	The DEIS must recognize state Sovereign Lands in the planning area, i.e., recognize the State's exclusive title and right to manage navigable sections of the Green and San Rafael Rivers as State Sovereign Lands.	BLM recognizes that it is bound by the law through to recognize state ownership of navigable waters. Through the Div. of State Lands v. United States court decision; 482 U.S. 193, 195-198 (1987) states; "lands underlying navigable waters have historically been considered 'sovereign lands.' State ownership of them has been 'considered an essential attribute of sovereignty."
State of Utah, Office of the Attorney General	Soil, Water and Riparian	The RMP should provide that waters and riparian areas shall be managed so as to not reduce grazing allotments based on healthy AUMs and to not result in NSO mineral development restrictions on nearby lands.	Appendix G of the Proposed RMP/Final EIS provides for exception, waiver, or modification of the riparian buffers.
State of Utah, Office of the Attorney General	Visual Resources	The RMP should not allow visual resource values to be managed in a way that negatively impacts "domestic livestock grazing,". . ."mineral exploration and production,". . ."timber production," and principal and major uses of the land. Visual resource management goals and priorities must be limited to protecting against only damage that is permanent and irreparable.	The RMP process establishes specific management objects for the area's visual resources based on the various resources uses and values. These designations are developed through public participation and collaboration. Subsequent to the land use planning process, a determination is made whether proposed surface-disturbing activities or development will meet the visual resource management objectives established for the area and whether design adjustments will be required. A visual contrast rating process is used for this analysis, which involves comparing the project features with the major features in the existing landscape using the basic design elements of form, line, color, and texture. This process is described in the BLM Handbook H-8431-1, Visual Resource Contrast Rating. The analysis is then used as a guide for resolving visual impacts. Once every attempt is made to reduce visual impacts, the BLM managers can decide whether to accept or deny project proposals. Managers also have the option of attaching additional mitigation stipulations to bring the proposed surface-disturbing activity into compliance. Also see general comment response #134.
State of Utah, Office of	Visual Resources	VRM I and II classifications constitute de facto wilderness management in violation of the multiple use mandate of	Please see general comment response #136

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the Attorney General		FLPMA, and triggering the withdrawal procedures therein.	
State of Utah, Office of the Attorney General	Visual Resources	The DEIS lacks the visual resource inventory, sensitivity level analysis, documentation and map overlay, and articulation of existing character and why retention of such is important, statement of acreage affected, etc.	Through the land use planning process, the BLM sets objectives for management of visual resources (landscapes) of all public lands. Any action the BLM implements must comply with those objectives. While the Draft RMP/EIS did not include detailed information on BLM's visual resources inventory, that information is available for inspection in the PFO. The Draft RMP/EIS Map 2-1 (no action) is the visual resource inventory.
State of Utah, Office of the Attorney General	Visual Resources	The DEIS is contrary to law to the extent it allows VRM Class I ratings in WSAs.	Please see general comment response #115
State of Utah, Office of the Attorney General	Wild and Scenic Rivers	Congress did not authorize BLM to perform interim protective management of proposed wild and scenic river segments that are not yet approved by Congress.	Please see general comment response #26
State of Utah, Office of the Attorney General	Wild and Scenic Rivers	The DEIS is contrary to law to the extent it even considers recommending for Wild and Scenic River designation those drainages that are not free flowing 12 months out of the year.	Please see general comment response #88
State of Utah, Office of the Attorney General	Wilderness	Wilderness Study Areas-The DEIS is contrary to law to the extent its interim management planning alternatives fail to recognize valid and existing grazing and mineral rights, as required by FLPMA section 1782(c).	Please see general comment response #110
State of Utah, Office of the Attorney General	Wilderness	The DEIS is contrary to law to the extent it authorizes imposing VRM I, and II classification on WSAs.	Please see general comment response #115
State of Utah, Office of the Attorney General	Wilderness	The DEIS should expressly call for return of a WSA to multiple use management when and if Congress releases the WSA from wilderness consideration.	Please see general comment response #112
State of Utah, Office of the Attorney General	Wilderness	Wilderness Characteristics management of non-WSA lands – BLM Instruction Memoranda 2003-274 and 2003-275 and their purported authorization of wilderness characteristics management violate FLPMA and improperly skirt the Utah v. Norton settlement agreement. Page 14 paragraph 7 thereof spoke only of BLM's possibly inventorying under Section 201 for characteristics that are associated with the concept of wilderness," not managing for those characteristics. The Secretary at page 12 paragraph 3 thereof conceded that the authority of BLM to conduct "wilderness reviews," expired no later than 1993. Page 7 paragraph 13.b thereof, as well as FLPMA Section 201(a), clearly provide that the preparation and maintenance of such inventory or the identification of such areas shall not, of itself, change or prevent change of the management or use of public lands. At page 13 paragraph 4 thereof the Secretary promised "the 1999 Wilderness Inventory shall not be used to create additional WSAs or manage the public lands as if they are or may become WSAs." At page 9 paragraph 17 thereof the Secretary conceded that "[m]anagement of Post-603 Lands to preserve their alleged wilderness character is inconsistent with FLPMA's Section 603 limited delegation of authority[.]" The Secretary conceded at page 6 paragraph 13 thereof that the BLM's 1979 Interim Management Policy ("IMP") as subsequently modified which required that WSAs identified in the Section 202 process be managed with the non-impairment standard, is inconsistent with BLM authority. The Secretary further conceded that the BLM's 2001 Wilderness Handbook, which authorized designation of WSAs pursuant to the 201 and 202 process and required management of such lands pursuant to the IMP, is inconsistent with BLM authority. At page 14 paragraph 7 thereof the Secretary promised not to establish, manage or otherwise treat public lands, other than Section 603 WSAs and Congressionally designated wilderness, as WSAs or as wilderness pursuant to the Section 202 process absent	Please see general comment response #108

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		congressional authorization.	
Stone Energy Corporation	Minerals and Energy Resources	Stone Energy has leasehold positions in the area west of Price for the Ferron Coal play and in deep rights under the Monument Butte Field. Whereas the Stone name is new to the Rockies, the company has a long Rockies history through Basin Exploration, Inc. which Stone acquired in 2001. Further, Stone's Denver staff have decades of combined experience in the Rockies province, including Utah. We are sensitive to environmental, arch and social concerns, and intend that our operations will be conducted in a multi-use approach that protects key existing areas and matters of concern whilst delivering critically necessary hydrocarbon resources to the American market. We encourage you to be steadfast in upholding the multi-use doctrine that has governed federal lands for so many years. Please do not be swayed inappropriately to one side or the other. The country depends on you to allow reasonable access to explore and produce the natural resources that power our economy and heat your homes.	BLM recognizes valid existing rights; however, new leasing is a discretionary action. The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of mineral development.
Tavaputs Ranch	Livestock Grazing	Please make every effort to ensure grazing on public lands will be continued for present and future livestock operations.	Please see general comment response #33
The Nature Conservancy of Utah	ACEC	The Conservancy recommends the maintenance of two existing ACECs that were designated for relict-vegetation values, and the new designation of four proposed ACECs that have ecology, vegetation, wildlife, and/or natural process values... Two existing ACECs with relict-vegetation features, Big Flat Tops and Bowknot Bend, should therefore be maintained as ACECs as provided for in Alternatives C and D... we recommend refined management for the Big Flat Tops and Bowknot Bend ACECs mostly similar to that presented under Alternative C(DRMP pages 2-107&108)	Please see general comment response #30
The Nature Conservancy of Utah	Forestry and Woodlands	Pinyon-juniper woodland encroachment (page 2-55) should be clarified to reflect the distinction between: (1)areas where P-J has invaded historically, and (2) areas where P-J 'belongs' and has always been present historically as +/- mature stands. Prior to preparing a Forest and Woodlands Management Plan (FWMP), it would be valuable to determine the current distribution and condition (especially invaded versus 'natural' status) of the forest and woodlands within the PFO area.. The statement for Commercial Harvest of Woodland and Timber Products under Alternatives A-D (page 2-56) could be made clearer.	The Draft RMP/EIS states pinyon-juniper woodlands treatments would be "implemented to move the woodlands toward their approximate historic range." Application of both this decision and the decision on page 2-55 captures the idea of "invading" pinyon-juniper versus stable pinyon-juniper woodlands. Implementation decisions in the Forest and Woodland Management Plan would apply these and other applicable decisions. The Proposed Plan/Final EIS clarifies the timber harvest decision on page 2-56 of the DEIS.
The Nature Conservancy of Utah	Minerals and Energy Resources	Priority must be given to maintaining Special Status Species over the implementation of Resource Uses within the Final RMP... Occurrences of Special Species, including some federally listed as Endangered or Threatened, are known from public lands shown as open to leasing (subject to terms and conditions of the lease form) under Alternative A and D... With regard to Mineral Materials (Salable), we support Alternative C, as shown on Map 2-40.	Please see general comment response #18 and #159
The Nature Conservancy of Utah	OHV Route Identification	With respect to Off-Highway Vehicles, we strongly support the designations for use areas and routes contained in Alternative C, and shown on Maps 2-15 and 2-55. While motorized recreation may add to local economies, it also	Please see general comment responses #19 and #132

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		has potentially severe impacts to natural resources and special-status species if not managed properly.	
The Nature Conservancy of Utah	Process and Procedures	Goals are described for each of the various categories of resources, resource uses, special designations and support. It is unclear exactly what these statements represent... A clarification of the nature and purpose of these Goal statements would be useful.	Chapter 2 of the Proposed RMP/Final EIS presents the goals and objectives of the alternatives. The BLM Land Use Planning Handbook (BLM Handbook H-1601-1) requires land use plans to express desired outcomes in terms of specific goals and objectives. Goals are broad statements of desired outcomes and are usually not quantifiable. Objectives identify specific desired outcomes for resources, are usually quantifiable, measurable and, where possible, have established time frames for achievement.
The Nature Conservancy of Utah	Recreation	For aspects of the Recreation program that differ by Alternative (starting on page 2-68), the Conservancy generally supports Actions under Alternative C. In addition, we offer the following recommendations for management of the recreation program: -No campgrounds or other recreational developments should be constructed in important habitat for special-status species or other species of concern. -All vehicle-supported campers and day users should be required to use constructed toilets or pack out their human waste. -Camping should be prohibited within 100 feet of riparian areas. -All mountain bikes should be treated as motorized vehicles and be restricted to designated roads and trails as defined in the travel plan (i.e. no cross-country mountain bike travel). -Climbing routes that are disturbing nesting birds of prey should be closed seasonally or permanently. -Special events should be limited in number and size. -Base-jumping should be allowed only in designated areas.	Please see general comment response #93
The Nature Conservancy of Utah	Soil, Water and Riparian	We support Alternative C as being best for biological resources... Further we recommend that BLM consider augmenting the standard approach for conducting PFC assessments to include indicators which enable BLM to assess riparian habitat conditions in addition to the prerequisite functioning of hydrologic processes.	The BLM PFO currently uses the methodology developed by the BLM, USFWS and the NRCS for assessing condition of lotic systems and lentic systems. The findings from these assessments are used to make decisions in managing the natural resources within the PFO.
The Nature Conservancy of Utah	Special Status Species	We recently completed broad-scale assessments of biological diversity in two ecoregions that overlap the Price Field Office planning area: The Colorado Plateau and Utah High Plateaus ecoregions... These 'additional' species and their Special Status (or similar) designations are: Accipiter gentilis (Northern goshawk) UDWR Species of Concern - Tier 1; Oncorhynchus clarki pleuriticus (Colorado River cutthroat trout) UDWR Species of Concern - Tier 1; Corynorhinus townsendii (Townsend's big-eared bat) UDWR Species of Concern - Tier 2; Nyctinomops macrotis (Big free-tailed bat) UDWR Species of Concern - Tier 2; Gila copei (Leatherside chub) UDWR Species of Concern - Tier 2; Oreoxis trotteri (Trotter's oreoxis) BLM Utah Sensitive Plant List; Sphaeralcea psoraloides (Psoralea globemallow) BLM Utah Sensitive Plant List; Aquilegia flavescens var. rubicunda (Link trail columbine) Forest Service R4 Sensitive Plant List; Astragalus consobrinus (Bicknell milkvetch) Forest Service R4 Sensitive Plant List; Erigeron carringtoniae (Carrington daisy) Forest Service R4 Sensitive Plant List; Hedysarum occidentale var. canone (Canyon sweetvetch) Forest service R4 Sensitive Plant List Our information shows that several of the above species occur on public lands administered by the PFO, and therefore should be added to the PFO Special Status Species list... The remainder of the species listed above occur on lands or in waters managed by the manti-La Sal National Forest, within the boundary of the PFO. On the assumption that the subsurface mineral estate of these lands is managed by the BLM, and is therefore under the auspices of the PFO	Please see general comment response #61

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		RMP, we recommend that these species be added to the PFO Special Status Species list as well... Should officially-designated 'sensitive' species of a sister agency, in this case the USDA Forest Service... Table 2 in Attachment A contains a list of species that do not at present possess any special federal or state status, but that are worthy of conservation attention for various reasons... That is, the coarse level of resolution in an RMP makes it difficult to fine-tune every program area or resource use decision within it so that every potential conflict is avoided... Then when subsequent activity-level plans and projects are developed, the RMP serves as the higher-tier authority for requiring that no adverse effects to Special Status Species happen at the finer scales of planning and implementation that are relevant to the occurrences of those species... The crux of the matter is that the Final RMP must be explicit about giving priority to maintenance of Special Status Species over the implementation of Resource Uses or Support Functions that may have adverse impacts on those Species.	
The Nature Conservancy of Utah	Vegetation	The Vegetation ACAA (page 2-30) allow for mechanical, fire, biological, and chemical vegetation manipulation under certain conditions. This 'common' language is at odds with Alternative C, which states that vegetation would be manipulated using only natural processes... we recommend that future invasion of pinyon and juniper be held in check NOT by future treatments, but by managing to achieve 'healthy' (properly functioning) shrub/grass/forb communities and processes that are able to resist such invasion by trees.	The language referred to in the comment has been revised for the Proposed RMP/Final EIS. Vegetation manipulation would be allowed, with restrictions, to achieve desired vegetation condition.
The Nature Conservancy of Utah	Wildlife and Fish	We recommend against establishing any new Blue Ribbon fisheries in streams where such establishment would be detrimental to native fish assemblages (via predation or hybridization)... does adequate documentation exist (from the Utah Division of Wildlife Resources or elsewhere) to conclude that a nine mile buffer is adequate to protect native sheep from disease transmission?.. we support a stricter interpretation of Alternative C - allowing only native species to be reintroduced into the area.	Please see general comment response #8
The Warriors Society	OHV Route Identification	My name is Chris Vargas and I am the Executive Director of the Warrior's Society, a 501 (c) 4 Tax-Exempt Organization made up of hikers, climbers, trail runners and mountain bikers. We work with the Forest Service to maintain and protect the multi-use trails in the Trabuco District of the Cleveland National Forest in Orange County California. In 2002 we were awarded the Trail Advocate award for Region 5 by the American Trails Association and the U.S. Forest Service. As a supporter of public recreation in our public lands I have some concerns regarding the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes in central Utah. It has been brought to my attention that the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. I agree with others that public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use. Several other issues have been brought to my attention: 1. The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and	Please see general comment responses #19, #20, #31, #37 and #81

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		concise regarding which roads and trails will be open for OHV use. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative; 2. The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50 vehicle group size limit; 3. Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	
The Wilderness Society	ACEC	TWS and others have submitted a number of ACEC proposals that include protection of wilderness characteristics, such as those in the scoping comments submitted by TWS and SUWA on February 15, 2002. The proposed Lower Green River ACEC and Temple-Cottonwood-Dugout Wash ACEC were both proposed for their naturalness and/or opportunities for primitive recreation and solitude. Although BLM found both of these proposed ACECs to meet the criteria for relevance and importance and recommended them for protection in certain management alternatives, BLM did not propose them for protection in the preferred alternative. See, Draft RMP/EIS, Appendix 26; pp. 4-504 - 4-507. Other proposed ACECs with wilderness characteristics that BLM declined to protect include: Cedar Mountain ACEC, Sids Mountain ACEC, San Rafael River ACEC, Muddy Creek ACEC, Price River Lower/Upper ACEC, Upper Green River-Desolation Canyon ACEC, Molen Reef ACEC, Antelope Valley ACEC, Mussentuchit ACEC, Lower Muddy Creek ACEC and Cedar Mountain #2 ACEC. BLM should designate these ACECs and include management prescriptions, such as closure to oil and gas leasing and ORVs that will protect wilderness characteristics.	Recreation and wilderness values are not relevant and important values for ACEC designation. “BLM has authority to designate Areas of Critical Environmental Concern (ACEC) where special management attention is required to protect and prevent irreparable damage to important cultural, historic, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards. Where ACEC values and wilderness characteristics coincide, the special management associated with an ACEC, if designated, may also protect wilderness characteristics” (IM-2003-275). However, BLM policy directs that “an ACEC designation will not be used as a substitute for wilderness suitability recommendations” (BLM-M-1613, section .06). Wilderness characteristics were not considered relevant or important values when evaluating or designing management for proposed ACECs. Also see general comment responses #141 and #156.
The Wilderness Society	ACEC	4. BLM has failed to fulfill its obligations to prioritize designation and protection of Areas of Critical Environmental Concern. In the Draft RMP/EIS, BLM assessed the thirteen existing ACECs and twenty-three proposals for new ACEC designations. In the preferred alternative, BLM proposes retaining ten of the existing thirteen under current management and accepting five of the nominated twenty-three new ACECs. While we appreciate BLM's	Please see general comment response #30

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		designation of new ACECs, BLM has neither designated enough of the proposed ACECs nor included adequate management prescriptions for protection of the important values they contain. The three "released" ACECs (Copper Globe, Temple Mountain, and Swasey's Cabin) are included in the new Heritage Sites ACEC. However, the protection for these special values has been reduced from the current management. The management prescriptions are now open with NSO instead of closed, and livestock use is no longer excluded in both Copper Globe and Swasey's Cabin. In assessing proposed new ACECs, BLM must first determine whether a given area meets the criteria for designation as an ACEC based on its relevance (in having significant value(s)) and importance (in having special significance and distinctiveness), 43 C.F.R. § 1610.7-2. Of the twenty-three proposed ACECs, BLM found ten to meet the relevance and importance criteria, but only proposed designating five in the preferred alternative. Where BLM has found that the special values in proposed ACECs meet the relevance and importance criteria, BLM should comply with its obligations to prioritize designation of ACECs in the planning process by proposing these new ACECs in the preferred alternative. Further, where BLM has improperly failed to take note of the relevance and significance of the resources and values identified in other proposals, BLM should also designate these ACECs. For those ACECs designated, BLM should comply with its obligation to prioritize protection of ACECs by applying appropriate management prescriptions.	
The Wilderness Society	ACEC	BLM has improperly failed to propose for ACEC designation four areas that have met importance and relevance criteria. In the Draft RMP/EIS, BLM declined to propose for ACEC designation four areas that have met importance and relevance criteria (Beckwith Plateau-Middle Mountain ACEC, Lower Green River ACEC, Temple-Cottonwood-Dugout Wash ACEC, and Gordon Creek ACEC). These areas were overlooked, despite the fact that BLM itself proposed each of these areas for ACEC designation in one or more of the other alternatives in the Draft RMP/EIS. The finding of relevance and importance, plus the inclusion of these areas in ACEC proposals in other alternatives, demonstrates that BLM has recognized the unique properties and special value of these areas and has also found them to be manageable as ACECs. The decision to exclude these valuable lands from the ACEC designations thus appears arbitrary and capricious and denies protection to important areas of wildlife habitat and wilderness characteristics.	Please see general comment response #158
The Wilderness Society	ACEC	BLM has improperly failed to acknowledge relevance and importance of other areas nominated for ACEC designation. SUWA and others submitted proposals for several other ACECs for which BLM has failed to take notice of their relevance and importance. As a result, BLM has failed to protect areas that provide valuable protection of wildlife and wilderness characteristics.	Please see general comment response #126
The Wilderness Society	ACEC	BLM has failed to provide interim protections for four areas whose ACEC designation has been deferred to the Richfield RMP revision process. BLM has deferred designation of four citizen-nominated ACECs (Dirty Devil Drainage ACEC, Horseshoe Canyon Drainage ACEC, Quitchupah Creek ACEC, and Thousand Lakes Bench ACEC) to the Richfield RMP process, because the majority of the lands in these areas are located in the Richfield Field Office jurisdiction. The relevance and importance of these areas is not discussed in the Price Draft RMP/EIS. However, as nominated ACECs, these lands are potentially both relevant and important, and they may merit further protection. Considering that there is, at present, no estimated time of delivery for the Richfield Draft RMP, these lands could be at risk for some time to come. It is incumbent upon BLM to provide interim protection for these candidates for	BLM Manual 1613, Section .21(E) directs that "if an area is identified for consideration as an ACEC and a planning effort is not underway or imminent, the [Manager] must make a preliminary evaluation on a timely basis to determine if the relevance and importance criteria are met." In the case of the ACECs that are predominantly administered by the Richfield Field Office, the Richfield planning effort is underway and considers these ACECs. Therefore, temporary management by the Price FO is not

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		ACEC designation until their status can be assessed during the Richfield RMP revision process. By neglecting to provide such protection in the Draft RMP/EIS for the Price Field Office, BLM is missing an opportunity "to protect and prevent irreparable damage" to potentially "important historic, cultural, or scenic values, fish and wildlife resources" in the intervening period.	necessary.
The Wilderness Society	ACEC	The Draft RMP/EIS does not address or even mention the nominated Castle Valley white-tailed prairie dog complex ACEC. Append ix 26 of the Draft RMP/EIS lists the nominated ACECs that were evaluated in preparing the Draft RMP, yet it makes no mention of the ACEC nomination submitted by Center for Native Ecosystems, Biodiversity Conservation Alliance, Southern Utah Wilderness Alliance, American Lands Alliance, Forest Guardians, Sinapu, and Terry Tempest Williams. On January 21, 2003, CNE submitted nominations for 25 large white-tailed prairie dog complexes, including the Castle Valley Complex in the Price Field Office. CNE clearly listed this complex in their nomination, and specifically addressed this nomination to the Price Field Manager along with other Field Managers in the nominated complexes. CNE explained how the complex should be delineated, and suggested management prescriptions necessary to retain the values that this ACEC would contain. CNE also cited extensively from the BLM Manual to outline the process that each Field Office must follow once a citizen's ACEC nomination has been received. CNE also sent their nomination to the Utah State Office, and subsequently confirmed that the nomination was received. As Appendix 26 indicates, FLPMA expressly gives priority to the designation of ACECs in the planning process. The BLM Manual explicitly states that nominated ACECs must be analyzed in RMP revisions whether or not they are found to meet the necessary criteria. Potential ACECs must also be included in at least one alternative in RMP revision. If the BLM chooses to leave a potential ACEC out of the preferred alternative, an explanation must be included in the RMP. The BLM must comply with FLPMA, its Manual, and all existing directives regarding special status species management and the prohibition against contributing to the need to list species under the Endangered Species Act. The final RMP must include a full analysis of this nominated ACEC.	Please see general comment response #126
The Wilderness Society	Cultural Resources	Requirements to conduct cultural resources inventories may be waived for a variety of reasons, including if the likelihood of finding cultural properties is deemed "negligible" or natural environmental characteristics are "unfavorable" to their presence. These standards are not defined and the methods by which BLM will make this determination (whether through an independent investigation or based on potentially self-serving data provided by the lessee) is not prescribed.	Inventory waivers may be applied only under limited circumstances as set forth in the BLM Manual, and pertain only to the conduct of pedestrian inventory for a particular proposed undertaking. Waivers would be employed only when there is defensible information to allow a professional judgment that physical traces of cultural resources are not present.
The Wilderness Society	Livestock Grazing	Chapter 1: Analysis and Recommendations: Issues raised in Chapter 1 (which are targeted for analysis in the DEIS) do not adequately address the relationship between range (forage, biomass, etc.) productivity and watershed ' values, wildlife needs (both habitat and forage), vegetation community resilience in the face of drought, etc. Nor does the DEIS properly address BLM's mandate to avoid permanent impairment, as stated in FLPMA (43 USC 1702), Section 103 (c): "the management of the public lands and their various resources...without permanent impairment of the productivity of the land and the quality of the environment..." It	Please see general comment response #33

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		almost seems as though the goal of the RMP is to manage public lands for one dominant purpose: to provide forage for livestock. This is NOT a suitable interpretation of BLM's multiple use mandate. We recommend that: Rangelands be managed to prevent the impairment of productivity and values (incorporate above text straight from FLPMA Section 103 (c)), and rangelands be managed to ensure wildlife habitat functions at a level that will ensure viable populations of native species.	
The Wilderness Society	Livestock Grazing	Chapter 2: Analysis and Recommendations: On page 2-3, it is not clear how BLM is planning to determine stocking levels and seasons of use for each allotment. BLM does note elsewhere in the DEIS that it shall "evaluate forage allocation for livestock, wildlife, and wild horses and burros that incorporate needs for wildlife habitat and protection of riparian and watershed values." It is critical that the Price F.O. hold itself to this pledge in future allocations of forage to livestock (and refining stocking rates).	Please see general comment responses #33 and #102
The Wilderness Society	Livestock Grazing	We recommend that the DEIS include in the plan means for incorporating ecology-based methods into their decisions on stocking levels and seasons of use for each allotment.	Please see general comment response #102
The Wilderness Society	Livestock Grazing	Such methods are described in the grazing management recommendations that WUP prepared for the Grand Staircase Escalante National Monument. (Please access http:/lrangenet.org/directoryljonesa/sulrpree/index.html for the full text.) These tools include: a biologically based GIS tool to more accurately assess allotment grazing capacity based on wildlife habitat function, range productivity, and other ecological needs, as well as an objective method to help determine when grazing is the cause of impaired lands failing to meet the standard. We recommend that these tools be incorporated as appendices to the DEIS and be used in making grazing decisions on individual allotments.	Please see general comment response #102
The Wilderness Society	Livestock Grazing	Stocking levels must be based on the carrying capacity of the range and calculated when the grazing permit is renewed (or more often if necessary, as in cases of severe, long-term drought).	Please see general comment response #102
The Wilderness Society	Livestock Grazing	The draft RMP goal for livestock grazing states: "Manage public lands to provide forage and management facilities for domestic livestock," "Provide for the orderly use, improvement, and development of the range for livestock grazing while maintaining Rangeland Health Standards (RHS)," and "Maintain, restore, and improve public rangelands to meet the RHS." (page 2-5). We recommend that the first sentence of this is changed to: "Manage public lands for domestic livestock in combination with other uses without the permanent impairment of the productivity of the land and the quality of the environment."	Please see general comment responses #33 and #83
The Wilderness Society	Livestock Grazing	On page 2-8, the plan discusses goals relevant to grazing management that would leave "sufficient cover and litter" on allotments, as well as a discussion of the Desired Plant Community (DPC). We recommend that the term "sufficient cover and litter" be changed to "cover and litter at or close to its potential." We also recommend that the DEIS define DPC to be "the natural plant community at its potential."9 If the DEIS keeps its current definition of DPC, any action can be claimed to be consistent with an arbitrary description of DPC. In practical terms, the lack of a clear definition of DPC means that the plan no longer offers guidance on further land actions. By not offering guidance, the plan sets the stage for conflict and an uncertain future.	The term "sufficient cover" is from the Standards for Rangeland Health. The current DEIS wording is that sufficient protection would be provided to maintain or improve resource condition for a sustained soil-vegetation community. Site-specific monitoring data would be used to determine if rangeland health standards are being achieved. DPC is not always the potential natural community

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			(PNC). It is the “desired plant community” that management has determined would achieve objectives for a specific land area. This may be a modified or altered plant community specifically maintained in some areas for a specific management objective noted in the RMP. The objectives could be for T&E species, spring elk calving, winter deer habitat, emergency fire rehabilitation, reduction of fire fuel loads for wildland urban interface areas near populated areas, recreation, etc. PNC may not achieve the objectives specified for any of these special land uses. Determining DPC is an interdisciplinary team process involving resource specialists and affected interests.
The Wilderness Society	Livestock Grazing	Noxious and invasive weeds were defined in an era where range was primarily managed for forage production. As a result, some invasive exotic species that have a destabilizing impact on the health, productivity, and function of habitat are not recognized or given adequate priority. New rangeland health standards now require ecological considerations to be included in assessments of invasive species and the threats they pose to ecosystems. For this reason, the definition of exotic plants should be reviewed and reframed to include ecological needs. We recommend that cheatgrass be added to the noxious weed list in the RMP. This plant is one of the most serious threats to the continued health and productivity of rangelands.	Noxious weeds are those plants that are noted in state and county regulations. This RMP cannot change the status of plants categorized as noxious. However, BLM does recognize several plants that can result in negative ecological impacts. This RMP has taken all State, County, and BLM noxious, invasive, and exotic species lists into consideration in developing this RMP. Draft RMP/EIS page 3-17 notes cheatgrass and a general description of its condition in the field office area. Cheatgrass does not appear to be a threat in the near future for the PFO, but it is a major problem in other parts of the state.
The Wilderness Society	Livestock Grazing	The use of the term "seral" when describing range conditions is outdated, and is not defined in terms that reflect current rangeland health requirements. The term "seral" reflects range theory that was refuted long ago. We recommend that the definition of range condition reflect forage plant productivity, measured as a percent of its potential. As such, we offer the alternate wording: "Range condition shall be classified as `Poor' for 25% forage plant production relative to its potential, `Fair' for forage plant production between 25-50% of its potential, `Good" for 50% to 75% of its potential, and excellent for 75% to 100% of potential."	It would not be appropriate to classify long term range conditions such as those referenced in the comment through the use of forage production. Such a classification system may fail to acknowledge highly desirable vegetation conditions for other purposes than forage. It would also change on a yearly basis as a result of precipitation levels making it essential useless as an indicator of long term range conditions. While range theory has shown that vegetation does not necessarily function in a seral stages/climax community progression, addressing range condition in terms of percent forage plant production does not address the full range of ecological factors that need to be considered for making decisions at a landscape

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			level. BLM is working with the NRCS and other agencies in developing “state and transition models” and “structural stages” as part of the ecological site descriptions which BLM uses as a comparison for condition classifications. As these descriptions are developed the Price Field Office will incorporate this new science into the decision making process.
The Wilderness Society	Livestock Grazing	In describing the preferred alternative on page 2-31, the DEIS states: "Sagebrush communities would be managed and maintained for natural composition and age class distribution, in a manner that accommodates key habitat condition for key sagebrush obligate species." The proposed alternative perpetuates grazing at a level that would prevent achieving this goal. We recommend adding to the plan an alternative that would reduce grazing use, especially in the growing season, to a level that would allow the recovery of sagebrush communities (especially its grass and forb component).	Livestock use during the growing season has been shown to reduce grass competition for nutrients and benefit sagebrush vigor, seed production, sagebrush establishment and increases forb production. Each sagebrush community with obligate wildlife species will continue to be evaluated to determine if a prescription grazing system could be implemented at the activity-level, using goals and objectives from the RMP. Evaluation and adjustment of grazing management practices (i.e. stocking rates, season of use, livestock kind) for individual allotments or groups of allotments is beyond the scope of this RMP and will be addressed at the implementation stage. Also see general comment response #33.
The Wilderness Society	Livestock Grazing	In describing the preferred alternative on page 2-40 to 2-41, the DEIS states that "Big-game winter range would be managed to maximize browse production, using class of livestock and season of use." We recommend that this wording be changed from "to maximize browse production" to "for browse to be at its potential for the desired plant community." Also, change "using class of livestock and season of use" to " using class of livestock, stocking levels, and seasons of use."	The term “class of livestock” has been changed to “kind of livestock” throughout the document. Draft RMP/EIS page 2-40 and 41 have been revised for the Proposed Plan/Final EIS to state that: “Big-game winter range would be managed to maximize browse production, using kind of livestock, stocking levels and seasons of use. DPC is not always the potential natural community (PNC). It is the “desired plant community” that management has determined would achieve objectives for a specific land area. This may be a modified or altered plant community specifically maintained in some areas for a specific management objective noted in the RMP. The action on page 2-40 and 2-41 is to manage vegetation for big game winter habitat. Managing for browse to be at its potential may not achieve the objectives specified for this land use. Determining DPC is an interdisciplinary team process involving

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			resource specialists and affected interests.
The Wilderness Society	Livestock Grazing	On page 2-57 of the DEIS, quoting the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah, it states: "On rangelands where a standard is not being met, and conditions are moving toward meeting the standard, grazing maybe allowed to continue. On lands where a standard is not being met, conditions are not improving toward meeting the standard or other management objectives, and livestock grazing is deemed responsible, administrative action with regard to livestock will be taken by the Authorized Officer pursuant to CFR 4180.2(c)." We recommend that the words "or other management objectives" be deleted from the above statement.	Changing Utah Standards for Rangeland Health is not an RMP level decision. BLM is a multiple-use agency and use of the public lands at any level may inherently result in some areas being utilized and will result in resources not being maintained at their natural potential. The comment states that the RHS should apply to all lands in all situations. Page 2-57 and Chapter 1 Planning Criteria state that the RHS would apply to “Actions Common to All Alternatives.”
The Wilderness Society	Livestock Grazing	Beginning on page 2-57, the DEIS lists areas that are "no longer available for livestock grazing." These areas include Buckhom Draw, Wildlife Allotment, Gray Canyon Wildland Management Area, and Horseshoe Canyon South Allotment. We applaud withdrawing these areas from grazing. However, one thing that is blatantly missing from the analysis is the suitability analysis that was performed to ascertain that these lands are unsuitable for grazing. If such an analysis was not done, this is an even more glaring omission. We recommend that the DEIS identify those lands suitable and unsuitable for livestock grazing throughout the Resource Area. BLM must develop consistent methods for determining suitability that includes all the multiple use values identified by the Interior Board of Land Appeals (IBLA) in the Comb Wash decision.	Please see general comment response #83
The Wilderness Society	Livestock Grazing	There is an obvious alternative missing from the DEIS, what might be called the "Multiple Use" Alternative. We strongly recommend that the Price Field Office consider and adopt as preferred an alternative that manages livestock grazing consistent with BLM's multiple use mandate and manage grazing so that the productivity and the values of BLM lands will not be permanently impaired. For rangelands that today fail to produce forage at their potential or have seen other values significantly impaired, management that would perpetuate or further worsen such conditions from one planning cycle to the next should considered permanent impairment. Yet, this is exactly what BLM is currently proposing for the Price Resource Area. For allotments where productivity is poor or fair, BLM should reduce stocking levels tiered to 15% of the annual forage production. For allotments in poor condition, BLM `should discontinue grazing during the first two months of the growing season. Alterative D recommends almost no change from current action. The land use plan indicates that most of the allotments have production significantly below its potential (Map 3-14), yet stocking levels and season of use will continue even though theses lands are impaired. We argue that a multiple use alternative that reduces stocking numbers and changes season of use is needed in order to meet the various planning standards found in the plan Alternative" (which in this case is applied to livestock grazing management).	Please see general comment response #102
The Wilderness Society	Livestock Grazing	Precipitation in the Price Resource Area is described in very general terms. No mention is made that one of the most severe droughts on record has been in progress for the past five years. We recommend that BLM provide a table that describes precipitation for the Price Resource Area for the past twenty years. If precipitation distribution varies widely through the Resource Area, this should be explained.	Draft RMP/EIS page 3-2 contains general information on the climate of the Price FO. Data for the RMP have been collected as far back as possible so as not to limit analysis to non-normal drought years. For livestock grazing, trends are analyzed over ten years, which includes years of drought, normal, and above normal precipitation. Rather than analyzing with a focus on abnormal

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			drought conditions, analysis was based on long-term trends, including average precipitation.
The Wilderness Society	Livestock Grazing	Table 3-15 (page 3-34) rates big game habitat for the Resource Area. A rating of good, fair, or poor is given to critical winter range, high-value range, summer range, breeding habitat, year-long range. We recommend that BLM use GIS to correlate the quality of game habitat with grazing allotments. The DEIS should analyze those allotments where RHS are not being met and the big game habitat condition is fair or poor. The current management in place on these allotments must be identified. The Price F.O. needs to make recommendations that will lead to restoration of the wildlife productivity and values of these allotments.	The objectives being asked for would be implemented through development of site-specific activity plans(e.g. recreation, wildlife, livestock, watershed). Site-specific adjustments in 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 1601-1 Appendix C page 14). Price FO will monitor range condition and adjust grazing management practices to meet the Standards for Rangeland Health as noted in 43 CFR 4180.
The Wilderness Society	Livestock Grazing	The DEIS states on page 3-41: "All grazing allotments are assigned a management category based on evaluations for resource potential and conflicts. The three management categories are Maintain, Improve, or Custodial. (Map 3-15 shows grazing allotments in these categories.) These categories set the priorities for funding allocation, manpower for planning purposes and achieving management objectives, and monitoring plans. Based on priorities, the allotment monitoring plans sets the frequencies for completing monitoring studies." We Recommend that the DEIS describe the methods used to determine that "resource production is moderate to high." (Category M) Define these terms and present the data used to determine current range productivity. For Category I, describe which allotments have low forage productivity, which have resource conflicts (and what those conflicts are), and which have both low productivity and resource conflicts. Explain how these category criteria are consistent with Rangeland Health Standards. Describe and present the data and analysis used to assess resource production for each allotment. Put this information on a BLM web site. Follow MRCS (SCS) standards for assessing range condition based on forage production.	MIC designation gives general guidance within the field office as to priority areas and how management will occur on the allotments. It provides a rationale for the intensity of the monitoring program on specific areas and identifies broad issues and concerns that can then be address in site specific activity plans. Although data to determine the classification needs to be site specific only general criteria can be given in the RMP. This gives direction on how allotments will be categorized in the future. The RMP provides for changing categories without amendment of the land use plan.
The Wilderness Society	Livestock Grazing	There is strong evidence that BLM may be under-reporting loss of productivity in rangelands. UDWR reports that sage grouse habitat in Carbon County is significantly degraded, concluding "forb/grass component is below levels recommend for sage grouse." Yet in Table 3-21, BLM claims that of those allotments in the category "Improve," only 12% are functioning at risk. One of the factors used to determine which rangelands are functioning at risk is plant community productivity. Where grass/forb productivity is less than 50% of its potential, a combination of factors normally would place such an area at risk. For some reason, UDWR's analysis (which also reflects field observations WUP has made in the Resource Area), appears to be in conflict with BLM analysis. There appears to be a disconnect between either the criteria used or the analysis that BLM followed. The only conclusion that we can draw is that BLM has under-reported those rangelands that have production significantly below its potential.	Results of range condition determinations by UDWR for sage grouse areas may show variation from the BLM RHS assessments since UDWR is looking at a DPC objective specifically for sage grouse habitat. Rangeland Health Assessments determine if a specific vegetative community is properly functioning as a whole. Conflicts arise in the value differences in developing management objectives for a particular parcel of land under the fundamental concept of multiple-use. Therefore, a “disconnect” between BLM and UDWR may exist due to the data and application of the DPC methodology mentioned. Objectives and priorities will be developed on a site-by-site basis through

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			RMP implementation and using an interdisciplinary team to develop activity plans, not through a broad based RMP.
The Wilderness Society	Livestock Grazing	The DEIS fails to present any information on the condition, rangeland health status, or productivity of rangelands. We recommend that, for each allotment, BLM use GIS to provide a map that displays current data on range condition and RHS assessments to show that the plan's decisions are consistent with the data. The DEIS should report by allotment rangeland health assessments for each allotment summarized in Table 3-23. Based on map 3-15 that identifies management category for each allotment, for Category I, describe if the reason for this category is low productivity, serious resource conflicts, or presents opportunities. It is logical to conclude that the tabular data reported in Table 3-23 comes from GIS data. The DEIS claims that RHS assessments have been completed for 66 of the approximately 200 allotments in this field office area. The DEIS does not explain which allotments have had such an assessment.	A map showing the areas that have been assessed for RHS has been added to the Proposed RMP/Final EIS. Verbiage has been added to page 3-42 in reference to Table 3-23 and Map 3-16, Rangeland Health Standards. Individual allotment assessment data is located in the PFO allotment monitoring files.
The Wilderness Society	Livestock Grazing	On 3-44, the DEIS seems to confuse the following terms: "authorized use," "permitted use," "licensed use," "active use," "percent of use," and "suspended use." The confusing use of these various terms makes it extremely difficult to determine what analysis is covered by each, what decision the plan is making, and what changes are proposed. We recommend making it clear how much grazing is expected to occur and how much has occurred. We recommend using actual livestock grazing data in this analysis.	The terms "licensed use", “permitted use” and “preference” are explained in the glossary and applied in the text of the Propose RMP/Final EIS. To analyze the "full" impacts of livestock grazing, analysis has to cover the potential use (full permitted use) that the grazing permittee could possibly use. Therefore, by using only the actual use AUMs (or in this case, licensed use to represent what was paid for) only a portion of the grazing impact would be calculated. For this reason, a weighted average was used to determine grazing use throughout a given use area. The existing environment addresses the trend AUMs been paid for (licensed use), not the permitted use ceiling that is contained in the old land use plans. The discrepancy between permitted and licensed is noted on Table 3-24 in the "percent of use" column. The analysis is based on permitted use, as future variations in precipitation and vegetation are not known.
The Wilderness Society	Livestock Grazing	On page 3-45 a table proposes to reduce grazing in the Resource Area by 14,000 "active use" AUMS. This represents about 14% of the total permitted grazing AUMs for this field office. Will this reduction result in a decrease in the numbers shown in Table 3-24? The table leaves it unclear if this is indeed a reduction in actual livestock grazing. The actual percentage use for these allotments in Table 3-26 is not given. We recommend that the environmental analysis on grazing impacts be based on actual grazing that has occurred. Environmental analysis is required on the higher "licensed use" or amount that appears in the grazing permit, and this analysis should assess whether grazing use at the permitted level can occur and whether the rangeland health standards can still be met. This plan makes decisions on how much grazing is authorized. For each allotment, the plan should state the amount of grazing that will be shown in the grazing permit and how	Table 3-26 does not propose a reduction in grazing within the PFO. The title of the table is "Changes in Livestock Grazing AUMs Since Previous Land Use Plans" The reduction of 14,810 active AUMs has already occurred. These reductions were made between 1983 and 2003. Table 3-24 depicts the "Actual Grazing Use" that has occurred as compared to the "Total permitted use available for grazing". The average percentage of use is 43% over the last 10 years. Annual adjustments to

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		much grazing will be allowed each year.	licensed use are made based on current range conditions and forage production amounts, including adjustments during periods of range depletion due to "drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage."(43 USC 315b).
The Wilderness Society	Livestock Grazing	The plan describes changes in grazing use for 26 allotments. The permitted grazing use in nearly 200 other allotments is not described. Based on the DEIS one could conclude that grazing in a majority of allotments will continue at past levels. The permitted number of livestock that this plan authorizes needs to be clearly stated for each allotment. BLM's decision to permit nearly twice as much grazing as has actually occurred is made without environmental analysis. Grazing at this level is highly likely to cause permanent impairment of the land's productivity and values over the RMP's life-span. Environmental analysis of this situation has not been conducted. Nowhere in the DEIS does BLM assess the impacts of grazing at permitted or licensed levels. The DEIS is inadequate, because it's grazing recommendations are not based on an environmental analysis.	Chapter 3 includes a table providing information on permitted and licensed use for the Price FO . Information is presented for selected allotments and allotments where there have been changes in use since previous land use plans. Monitoring data indicates that 90 percent of the public lands in the Price FO are ecologically functioning under present management. As present levels of permitted use, moderated with annual adjustments in use based on range conditions to meet the Standards for Rangeland Health, the range has provided for an ecologically sound sustained yield in 90 percent of the Price FO. This does not mean that there are no problems in site-specific areas. Price FO will continue to monitor the balance of the grazing allotments and address problem areas with changes in management practices or make changes in the permitted levels of grazing use implementation level decisions. The principle is not how much grazing use is authorized in Price FO, but that the level of grazing use does not cause degradation of the public lands. Under several years of drought conditions, Price FO has worked with the grazing permittees to adjust their grazing use in relation to the severity of the drought.
The Wilderness Society	Livestock Grazing	Page 4-278 of the DEIS states: "Many species of birds have a symbiotic relationship with livestock grazing. Continued grazing activities would have no significant impact on these species." We recommend that the Price F.O. present a balanced analysis of this one-sided statement. Clearly, wildlife habitat degradation over time and increased habitat fragmentation has led to declines in key wildlife species. Livestock grazing has significantly impacted sage grouse populations, for example, and there is extensive literature describing the impacts of livestock grazing on many other bird species and guilds: This section of the DEIS should objectively describe the number of bird species, summarize for each the respective trends in populations, and assess their viability and function of needed habitat for each species.	The preceding page (4-277) stated "Sagebrush- and grassland dependent sensitive special status species populations and habitat could decrease because of livestock-influenced plant communities." Both this statement and the statement quoted are correct and present both sides for a balanced assessment. Utah has 426 bird species. While not that many would be within the Price FO summarizing for each their population trend and assessing the viability and function of their habitat is beyond the scope of this programmatic

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			document. In site-specific planning more detail can be presented for birds. The Price FO will follow the national BLM guidance for evaluating a project's effect on birds. Through implementing this RMP, BLM will take reasonable steps to restore and enhance habitat, prevent or abate pollution affecting birds, and incorporate migratory bird conservation into the planning processes. Environmental analyses of federal actions required by NEPA or other environmental review processes must evaluate the effects of actions and agency plans on migratory birds with an emphasis on sensitive species.
The Wilderness Society	Livestock Grazing	On page 4-4, the DEIS lists six separate types of projects and activities as having the greatest likelihood of generating potential cumulative impacts. Grazing is not on this list, and we believe it should be.	The Draft RMP/EIS considers and analyzes management decisions for livestock grazing and OHV use within the Price FO. As such, the impacts of these decisions are included in the cumulative impact analysis. Such inclusion is acknowledged with the phrase "...when added to the Price RMP alternatives."
The Wilderness Society	Livestock Grazing	In the table on page 4-277, the DEIS commits an error that we see far too often in this document. It states that simply, because "adhering to the Utah Standards and Guidelines for Healthy Rangelands would apply to all livestock grazing activities on public lands... [this would] indirectly improve special status species populations and habitats." Just because a standard or guideline will be applied in a situation is no guarantee that it will be met. This is a most inappropriate format to be using for a responsible analysis of environmental effects.	It is to be assumed that the RMP is written in good faith and is to be followed by both the BLM and public land users. The RMP goals and objectives are based on the assumption that funding and manpower will be appropriated by congress for the implementation of the plan. It would be appropriate and prudent for BLM to follow its own planning document. Specifically related to the Standards for Rangeland Health, 43 CFR 4180.2(c) requires BLM to "take appropriate action as soon as practicable" upon determining that livestock grazing is resulting in rangelands failing to meet the standards. As such, not only does the EIS assume that the RMP decisions will be implemented, Federal regulation requires it.
The Wilderness Society	Livestock Grazing	In the table on page 4-278, the DEIS states that "the use of prescriptive grazing methods, season of use and kind of livestock, and the prescription on crucial winter range could reduce competition and help sustain mule deer and elk populations." This claim is too vague to be instructive. What sort of prescriptive grazing methods is the table referring to, and how will they reduce competition? What kind of season of use prescription is BLM going to apply? Again, this issue takes us back once again to the very pertinent issue that we have raised many times with the	Several decisions in the Fish and Wildlife section address specific season of use changes or other changes in grazing management practices to benefit wildlife. Evaluation and adjustment of grazing management practices (i.e. stocking rates, season of use,

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		Price F.O.: this issue and many others are best resolved with an adequate forage/capacity analysis of the allotment in question to provide suitable forage for cattle AND game. Without this sort of analysis, BLM will only be guessing as to what stocking level is the correct one to provide for the simultaneous needs of cattle, wildlife, and the larger natural community to remain resilient in the face of drought. Again, we refer BLM to our guidance document for the Grand Staircase Monument's grazing program.	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.
The Wilderness Society	Livestock Grazing	In the table on page 4-276, the DEIS states, "livestock grazing would have short-term impacts to soils, water, and riparian resources. However, long-term trends indicate no significant impacts depending on the availability of forage and water, and the absence of drought conditions." This claim is not only vague but nonsensical and completely unsupported. The scientific literature is replete with evidence that the impacts of grazing can be both short- and long-term. Precisely which "long-term trends" is the DEIS referring to here? The long-term trend for any given riparian area may be upward or downward in the presence of cattle grazing, IF there is adequate forage available (as the table implies), IF there is adequate water available (as the table implies), and IF there is no drought. But how BLM can claim that this will in fact be the case is unclear.	The Standards for Rangeland Health contain indicators to be met that include consideration of soils, riparian areas, and water quality. The impact analysis accounts for the fact that some areas may not always meet these standards and could result in short-term impacts. However, 43 CFR 4180.2(c) requires BLM to "take appropriate action as soon as practicable" upon determining that livestock grazing is resulting in rangelands failing to meet the standards. As such, long term condition of soil, water and riparian will be functioning properly, in accordance to the Standards for Rangeland Health.
The Wilderness Society	Livestock Grazing	In the table on page 4-277, the DEIS states," livestock grazing is not anticipated to impact any federally listed species." Yet the very next sentence states, "However, continued livestock grazing in sagebrush communities with sage grouse habitat may reduce this species population because of declining habitat quality." Clearly, BLM acknowledges an impact to a federally listed species.	While the sage grouse is a special status species on BLM and state lists, it is not an official Federally listed species (see Table 3-12 on Draft RMP/EIS page 3-25). As such, the statement is correct.
The Wilderness Society	Livestock Grazing	In the table on page 4-284 to 4-285, the column under Alternative D states, "Continued grazing in and near sensitive...riparian resources would have a continued impact on these resources. The loss of vegetative cover..." Yet, just below this statement, the DEIS states that continuing grazing as presently allocated would NOT impact vegetation resources. BLM needs to clarify whether or not grazing will decrease vegetation and thereby impact riparian areas.	The Proposed RMP/Final EIS addresses riparian along with soil and water rather than with vegetation. The differences in impacts to vegetation in general and riparian are noted.
The Wilderness Society	Livestock Grazing	Drought is not addressed in the land use plan. From 2000 to mid-2004, the western states have endured a period	Please see general comment response #33

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		of serious drought. While grazing stocking numbers declined early in this period, for one year during the drought grazing numbers increased above historic levels in normal precipitation years. BLM needs to explain this anomaly. We recommend that the preferred alternative recommend that stocking numbers should be reduced to a level that can be supplied by 25% of the forage grown during a drought. Grazing during the first two months of the growing season should not be allowed in times of drought. Such a reduction should take place immediately once drought condition forage production is known. Once the drought ends, grazing stocking should be at a reduced level until the productivity of the range is at or near its potential. Drought is a normal occurrence. This plan should outline the expected response to drought. In the past, delayed response to drought has led to plant community changes that permanently impair the productivity of the land. Plant growth during drought is barely sufficient to meet the needs to sustain range plants. Grazing at normal levels during a drought will lead to sustained productivity losses.	
The Wilderness Society	Livestock Grazing	A combination of factors has placed many key species at risk in the Price Resource Area, but BLM does not often acknowledge the role that livestock grazing has in the demise of these species. For each allotment pasture, the plan should assess the plant community's level of ecological function and the true livestock grazing capacity for that pasture. This information should be used in assessing livestock stocking rates that meet the Utah Standards and Guidelines for Healthy Rangelands. BLM must also outline in the revised management plan how it intends to bring lands that are not functioning or functioning at risk back to a properly functioning condition. The DEIS must carefully document all of these analyses.	Please see general comment response #102
The Wilderness Society	Livestock Grazing	BLM must consider the significant impacts of grazing and develop appropriate measures to manage and mitigation those impacts. NEPA requires BLM to assess direct, indirect, and cumulative impacts and effects of potential actions on other resources, including ecological values "such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems." 40 C.F.R. § 1508.8. "Cumulative impacts" are defined to include the impacts of "past, present and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. As discussed in detail above, grazing has wide-ranging effects on the ecosystem and BLM has not fully assessed these impacts, including the well-documented, reasonably foreseeable cumulative impacts of grazing on wildlife, habitat and biota. Once these impacts are truly considered, BLM should heed FLPMA's requirement to "minimize adverse impacts on the natural, environmental, scientific, cultural, and other resources and values (including fish and wildlife habitat) of the public lands involved." 43 U.S.C. §1732(d)(2)(a).	Impact analyses were revised to reflect changes in the alternatives and to improve the clarity and readability of the document.
The Wilderness Society	Livestock Grazing	FLPMA also requires that: "In managing the public lands the [Secretary of Interior] shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. §1732(b). By adopting the measures proposed above, BLM can meet its obligation to minimize and avoid degradation of the ecosystem, while preserving wildlife, habitat and plant life.	Please see general comment response #33
The Wilderness Society	Livestock Grazing	Managing to maximize browse is a concept that is likely to be inconsistent with the ecological goals of the rangeland health standards. Distorting the plant community productivity for one management purpose comes at ecological costs. To make this consistent with the rangeland health standards, the recommended language chooses as an upper limit the appropriate amount and kind of browse consistent with the potential of a specific kind of habitat. The management options to achieve this goal should include changes in stocking levels as well as length of grazing use.	Please see general comment responses #33 and #83

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The Wilderness Society	Livestock Grazing	Also, as clearly required by the Standards and Guidelines, this standard must be applied to all allotments in all conditions. As such, the DEIS needs to make it clear that this standard applies to all alternatives, and that administrative action must be taken within one year of when a determination is made that livestock is a significant factor contributing to standards not being met on an allotment. Moreover, as currently written, the DEIS incorrectly implies that this guideline only applies in times of drought, fire, flood, and pest infestation. This guideline applies to all grazing decisions in all situations.	Chapter 1 and Section 4.3.2 of the Draft RMP/EIS state that the RHS would apply to "Actions Common to All Alternatives." The language concerning drought, fire, flood and pests is language from the Taylor Grazing Act rather than the RHS.
The Wilderness Society	Minerals and Energy Resources	4. BLM has not provided sufficient mitigation of the impacts of oil and gas development. In order to rely upon mitigation of the environmental consequences of oil and gas development, BLM must firmly commit to mitigation of oil and gas development and describe the measures to be taken in sufficient detail.	Please see general comment response #18. Appendix G of the Proposed RMP/Final EIS identifies stipulations for surface disturbing activities along with criteria for exceptions, modifications and waivers.
The Wilderness Society	Minerals and Energy Resources	The mitigation actions discussed in the Draft RMPIEIS do not meet NEPA's standards. As discussed in detail below, the mitigation actions in the Draft RMP/EIS are not sufficiently defined, evaluated for effectiveness, or enforceable. In order to comply with NEPA, the RMP should require more detail on the mitigation actions to he performed, the manner in which they will prevent environmental consequences, the degree to which potentially significant impacts are mitigated to levels below significance, and a definitive schedule for taking any such actions. The mitigation measures recommended below meet these criteria and should be applied by BLM instead.	The impact analysis in the Proposed RMP/FEIS is based on implementation of stipulations and mitigation measures applicable to each of the alternatives analyzed in detail. Appendix G of the Proposed RMP/Final EIS identifies stipulations for surface disturbing activities along with criteria for exceptions, modifications and waivers.
The Wilderness Society	Minerals and Energy Resources	As in the case of drilling, some lands are so sensitive to disturbance that they are inappropriate for any type of seismic exploration. In the Final RMP/EIS, shot-hole seismic should be the method of choice unless specific concerns about archaeological or paleontological resources preclude the use of the shot-hole method. In addition, heliportable drills and hand-laying of geophone lines should be mandated for sensitive lands. The impacts described above will have similarly extensive effects on wilderness characteristics.	Site specific analysis is done in an environmental assessment when seismic exploration is proposed. BLM retains sufficient authority under standard lease terms and lease stipulations and notices to require mitigation for protection of sensitive resources, including archaeological and paleontological resources.
The Wilderness Society	Minerals and Energy Resources	Core Areas: The Heart of the West Conservation Plan recommends no new oil, gas or CBM leasing, exploring, or drilling outside of existing developed energy fields. Within existing energy fields, the plan recommends direction drilling from existing well pads only for core areas. Outside Core Areas: Whenever oil and gas development is pursued under the new RMP, it should employ available technologies in a way that minimizes damage to the environment. Attached as Exhibit 10 to these comments you will find the report, Drilling Smarter: Using Directional Drilling to Reduce Oil and Gas Impacts in the Intermountain West. We incorporate this report and all of the studies referenced therein into these comments by reference. In areas where surface disturbance from drilling is appropriate (i.e., outside areas recommended for NSO stipulations or withdrawal from leasing), directional drilling and other technologies should be employed in every case where they reduce the environmental impacts over conventional methods. Because clustering wells on a few isolated pads for full-field development or drilling horizontally from existing well pads in infill situations results in a radical decrease in road, well pad, and pipeline construction, directional drilling should become the standard drilling procedure under the Final RMP.	Please see general comment response #16 and #161
The Wilderness Society	Minerals and Energy	Pitless drilling permits smaller well pads and eliminating toxic reserve pits filled with toxic chemicals. In cases	Even with the most effective, state-of-the-art on-site

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	Resources	where this and other state-of-the-art technology reduces the overall environmental impacts, it should be required under the RMP.	mitigation, oil, gas, geothermal and energy exploration, development and right-of-way authorizations can result in impacts to the environment. Under Standard Lease Terms the BLM retains sufficient authority to require pitless drilling needed to protect other resources.
The Wilderness Society	Minerals and Energy Resources	For areas where surface disturbance is permissible, drilling activities should occur in a staged manner, allowing landscapes impacted by well fields to heal at the same rate as new landscapes are gobbled up. While staged development would at first appear to be a difficult program to implement, we have devised a simple method to facilitate this process. BLM should first identify all parcels of 3,000 acres or more that free of "roads" as defined under BLM Handbook H-6310-1, regardless of the presence or absence of wilderness qualities. This alternative would require a "No Net Loss" policy to be instituted for these qualified roadless areas, so that new roadless areas could not be entered for the purpose of roadbuilding and oil and gas development until a similar acreage already impacted was restored to "roadless" status.	Please see general comment response #18. The measures described in the comment could be considered through implementation level analysis of field development proposals.
The Wilderness Society	Minerals and Energy Resources	For CBM development, wastewater should be re-injected into aquifers of similar qualities or treated to match surface water qualities. In addition, in cases where changes of temperature flow pattern, or water properties might cause impacts to rare native fishes or otherwise threaten the viability of native species, wastewater re-injection should be mandatory.	The standard practice for coalbed natural gas development in the Price field office is re-injection of produced water. There is no surface discharge of produced water within the Price field office.
The Wilderness Society	Minerals and Energy Resources	No effort should be spared to return mined, roaded, and drilled landscapes to their original condition once development activities have ceased.	It is a standard practice in the Price field office to reclaim, roaded and drilled landscapes once development activities have been completed. This would be required under any of the alternatives analyzed in the Proposed RMP/Final EIS.
The Wilderness Society	OHV Route Identification	We appreciate BLM's acknowledgement of the damage that off-road vehicles (ORVs) can have to wildlife, habitat and wilderness characteristics and BLM's commitment to designating routes in this planning process. However, we remain concerned that neither BLM's preferred alternative nor the other management alternatives provide sufficient protection for the ecosystem from the impacts of intrusive activities, especially ORVs and oil and gas development. We are especially concerned with the deficiencies in the Draft RMP/EIS's analysis of the impacts from potentially destructive activities, which has led to corresponding deficiencies in recommendations for protective measures - such as closures of sensitive areas to oil and gas development or' ORV use and the imposition of stringent lease stipulations, including best management practices. We have set forth our specific concerns about these issues below.	Please see general comment response #19
The Wilderness Society	OHV Route Identification	BLM has not provided sufficient protections of wildlife and wildlands against the impact of off-road vehicle use.	Please see general comment response #19
The Wilderness Society	OHV Route Identification	BLM's analysis of alternative route designations does not adequately assess the impact of ORVs and does not provide sufficient protection for other resources.	Please see general comment response #19. The impacts of ORV use on all other resources and uses have been addressed in the Proposed RMP/Final EIS.
The Wilderness Society	OHV Route Identification	The route designation alternatives presented in the Draft RMPIEIS do not take into account the extent of the conflict with other resources, such as wilderness characteristics, wildlife habitat, soil, water, and riparian areas. BLM's assessment of impacts from transportation and motorized access on Non-WSA Lands with or Likely to	Please see general comment responses #12 and #36

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		Have Wilderness Characteristics notes that ORV use will impact opportunities for solitude and primitive recreation in lands with wilderness characteristics, but characterizes the impacts as only "during use" of the motorized vehicles. Draft RMP/EIS, p. 4-483). However, the presence and noise of ORVs effectively prevents experiencing solitude and primitive recreation - the fact that the presence and noise may occur in separate events, instead of continuously, does not change the reality that the quiet recreational user no longer experiences the landscape as natural or feel the solitude that is key to primitive recreation.	
The Wilderness Society	OHV Route Identification	BLM's analysis of the impacts- from ORVs does not take into account the "risk" of cross-country travel due to access for designated routes, which can increase the potential adverse impacts on other resources, such as cultural sites and wilderness characteristics. NEPA requires BLM to assess direct, indirect, and cumulative impacts and effects of potential actions on other resources, including ecological and cultural values. 40 C.F.R. § 1508.8. "Cumulative impacts" are defined to include the impacts of "past, present and reasonably foreseeable future actions." 40 C.F.R. § 1508.7. In this context, BLM must take into account the reasonably foreseeable cross-country travel resulting from the increased access of ORV routes and the correspondingly heightened impacts on other resources, such as wildlife habitat, cultural resources, and wilderness characteristics. BLM must consider these impacts, which increase the environmental consequences of the management alternatives presented in the Draft RMPIEIS and further indicate the need for more environmentally protective alternatives.	Cumulative impacts of OHV use on other resources and uses are analyzed in Section 4.7 of the Proposed RMP/Final EIS. Also see general comment response #19.
The Wilderness Society	OHV Route Identification	BLM has underestimated the effects of ORV use and the extent of conflicts with other resources, such that the alternatives presented do not include alternatives with genuinely lesser impacts and conflicts, as required by NEPA and BLM's ORV regulations. BLM states that it will not designate routes in Devils Canyon, Hondu Country, and Mussentuchit Badlands for OHV travel, even though these areas are not formally closed. Draft RMP/EIS, p. 4-483. If BLM is willing to make a commitment to protect the values of these areas, then the entire area should be designated as closed. Alternatively, we would recommend that the RMP provide a clear description of how this commitment will be enforced and what standards would apply before routes could be designated (such as requiring preparation of an environmental assessment with an opportunity for public review and comment.	Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Enforcement, signing etc. will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. Also see general comment responses #15 and #19.
The Wilderness Society	OHV Route Identification	The alternatives must also include specific monitoring and enforcement commitments. Based on the results of this monitoring and evaluation, BLM is required determine when the information generated will "warrant amendment or revision of the plan." 43 C.F.R. § 1610.4-9. Therefore, in order to fully consider and address potential impacts from various alternatives, BLM must include monitoring and enforcement commitments.	Please see general comment responses #15 and #19
The Wilderness Society	OHV Route Identification	BLM should consider information presented in Heart of the West and the TU Report regarding core habitat areas and linkages. These reports show sensitive areas that require special protection to support the Heart of the West ecoregion. BLM's alternatives should include necessary protection of these areas from ORV use.	See general comment responses #19 and #161
The Wilderness Society	OHV Route Identification	The plan needs to include comprehensive analyses of the general impacts of ORV use on desert biota and ecosystems, and include site-specific analyses of where ORV use is inappropriate due to expected impacts on species at risk and their essential habitats, along with all other resources considered in the upcoming DEIS. The plan revision needs to include a set of maps that clearly depict which trails and routes are open, open but limited, and closed to ORV use. After these trails are designated, BLM must follow through with clearly posted signs on	See general comment responses #12, #19 and #20

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		the ground, so there is no question to visitors as to what is open and closed. The Field Office must also implement effective, frequent monitoring of ORV impacts in areas posted as open and set clear benchmarks which, if exceeded, trigger closure of an area to ORVs. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, BLM should not allow the use. The agency must also restrict ORV from wilderness study areas, areas that BLM inventoried and found to have wilderness character, and from areas within America's Redrock Wilderness Act. These [ands comprise a fraction of the lands within the Price Resource Area, and leave plenty of lands open for ORV use elsewhere.	
The Wilderness Society	Process and Procedures	• On page 1-18 of the DEIS, the plan mentions monitoring but fails to describe how monitoring will be used in implementing this plan. We recommended the following changes to this section: o Add language that describes adaptive management and the role of monitoring in adaptive management; o Add language that describes the kind of monitoring needed to implement the plan; o State a requirement that such monitoring gather data to determine whether planning goals are reached in a measurable manner (as resources allow); and o Make monitoring data and its analysis available to the public.	Chapter 2 of the Proposed RMP/Final EIS describes goals and objectives. During implementation of the plan monitoring would be done according to program requirements for resources and resource uses. Chapters 3 and 4 note that monitoring would be done for air quality, cultural resources, livestock grazing and land health, wild horses and burros etc. The public may request specific information, including monitoring data at any time.
The Wilderness Society	Soil, Water and Riparian	When assessing the biological role of the very limited number of riparian corridors in the Price Resource Area, it is important to consider the watershed that is associated with the main stream corridor.	The 4180 manual, tied to CFR 4180, instructs BLM to look address issues on a watershed scale. The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, and reducing erosion, stream sedimentation and salinization. Water resources would also be protected in community watersheds and sources of culinary water. Decisions in the RMP concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition.
The Wilderness Society	Soil, Water and Riparian	The preservation and conservation of ALL riparian habitats in the Price Resource Area should be a major priority. Moreover, because of the relative isolation of riparian sites from other areas of similar habitat (i.e., riparian zones associated with a different drainage), their recovery from disturbance is likely to be hindered by the difficulty of recolonization from other drainages. This makes it all the more crucial that small, isolated wetlands interspersed within the landscape, such as springs and small ponds, are also carefully protected, because they may partially aid in limited recolonization and dispersal between disjunct riparian zones in desert lands.	Please see general comment response #70
The Wilderness Society	Soil, Water and Riparian	Heart of the West, as well as WUP's prior comments, provide environmentally protective alternative management that should be fully evaluated and incorporated into the Price RMP for protection of riparian areas. Heart of the West also provides alternative management practices that should be incorporated into the Price RMP. As discussed in detail above, BLM is mandated by FLPMA to minimize adverse impacts on the natural and environmental resources and values (including fish and wildlife habitat) of the public lands, and by NEPA to	The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, reducing erosion, stream sedimentation and salinization. Water resources would also be protected in community watershed and sources of culinary

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		consider environmentally protective alternatives. BLM's internal guidance also directs consideration of balancing various resources and application of best management practices for oil and gas development. BLM can best fulfill these obligations by evaluating and implementing the environmentally protective management prescriptions contained in Heart of the West to protect riparian areas from destructive activities.	water. Decisions in the RMP concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition. The Bush administration has recently reaffirmed the "no net Loss" policy. EPA and Corps of Engineers as recently as January 2003 issued a joint news release stating a reaffirmation to the "no net loss." EO 11990 and 11988 were signed by President Carter to protect wetlands and floodplains. Goals and objectives of the RMP (under section 2.1.2) are to manage to restore or maintain the resources under the basic disciplines (air, soil, water, and vegetation) as well as the proper management of all resources to allow reasonable multiple use of the resources. Also see general comment response #161.
The Wilderness Society	Soil, Water and Riparian	In addition, BLM should adopt the procedure for analysis of risks and protection of riparian areas previously submitted by WUP, which were not incorporated into the Draft RMP/EIS. The Price RMP should identify all riparian and wetland areas, assess their current health and level of function, and analyze how management prescriptions in the various alternatives of the plan will affect the ecological function of such areas. BLM must also discuss how it intends to bring riparian zones that are not functioning or functioning at risk back to a Properly Functioning Condition (PFC). Achieving this is likely to require cessation of ORV use and livestock grazing in all riparian areas in the Price Resource Area. As the scientific literature clearly shows that absence of these activities results in improved riparian condition, the Price Field Office must seriously consider the exclusion of these activities from streams in the Price Resource Area. In addition, the revised RMP needs to develop an improved riparian and stream monitoring program that improves on the standard PFC procedure outlined in TR 1737-9. The current PFC procedure used by BLM does not fully comply with the Standards and Guidelines for Healthy Rangelands. Though the PFC protocol was formulated at the national level as general guidance, the process is expected to be refined in each ecological region (1737-11).	Please see general comment response #74
The Wilderness Society	Soil, Water and Riparian	Further, wetland/healthy riparian abundance is not characteristic of the Price Resource Area. In fact, as rich wetland resources are generally rare in Utah's deserts, all rivers, tributaries, seeps and springs in the Resource Area should be promoted for protection. This could help stem the tide of wetland/riparian loss within our arid lands. The severity of this loss, to date, on western arid lands cannot be overstated. In 1990 the EPA concluded that riparian conditions throughout the west are the worst in American history (Chaney et al. 1990). By implementing the protective measures discussed in these comments, BLM can support and even improve health of the vital riparian areas.	Please see general comment response #68 and #74
The Wilderness Society	Soil, Water and Riparian	Topsoil should be reserved during every surface-disturbing activity, so that it can be replaced during the reclamation process.	A standard operating procedure for O&G development is to store the topsoil and use it for reclamation purposes. This measure is common to all alternatives.

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The Wilderness Society	Soil, Water and Riparian	The DEIS defines critical watersheds as areas that "include soils that have a high potential for salt yield, are subject to severe water and wind erosion when disturbed, have high runoff potential during storm events, are subject to frequent flooding, and have a potential for loss of vegetation productivity under high rates of wind or water erosion." Unfortunately, there is no offered correlation between land uses (i.e., grazing) and land condition. We recommend that, for those allotments that include critical watersheds, the DEIS report the results of the Rangeland Health assessment, PFC assessment, and the determination of whether grazing is the cause of impairment, and develop a recommended remedy to improve those watersheds.	A map showing the areas that have been assessed for RHS has been added to the Proposed RMP/Final EIS. Verbiage has been added to page 3-42 in reference to Table 3-23 and Map 3-16, Rangeland Health Standards. Individual allotment assessment data is located in the PFO allotment monitoring files. Changes in grazing practices or levels are made as implementation rather than plan level decisions.
The Wilderness Society	Soil, Water and Riparian	Table 3-4 (page 3-11) reports that 783 miles (75%) of riparian habitat in the Resource Area are in proper functioning condition, 83 miles are functioning at risk with an upward trend, 104 miles are functioning at risk with a stable trend, 34 miles are functioning at risk with a downward trend, and 20 miles are not functioning. We recommend that the DEIS link these findings with land uses and management (or, at the very least, indicate where grazing is the cause of impairment on those riparian zones functioning at risk with a downward trend or not functioning).	Adjustments in levels and methods of grazing are made through implementation rather than plan level decisions. When livestock grazing is the cause for any land to be in less than properly functioning condition, the authorized officer has until the next grazing year to act to make the area move toward properly functioning condition (43 CFR 4180.2c). Therefore, livestock grazing will be adjusted to restore rangeland health during the time that the Price RMP is being revised. The areas that are functioning at risk or are non-functioning are mainly created by situations and activities other than grazing. The impacts of planning decisions on Rangeland Health are analyzed in Chapter 4 of the Proposed RMP/Final EIS.
The Wilderness Society	Special Status Species	1. BLM must protect species, habitat, and landscapes. BLM has not addressed impacts to important species in the Draft EIS/RMP. n page 3-25 of the DEIS, BLM lists the animal species of concern that are addressed in the Draft RMP. This list appropriately includes: 1) all federally listed threatened and endangered (T/E) and candidate species known or suspected to exist in the Price Resource Area, 2) birds identified on the U.S. Fish and Wildlife Service (FWS) list of Birds of Conservation Concern, 3) birds recognized by Partners in Flight as most in need of conservation, and 4) other state species of concern' as identified by Utah Division of Wildlife Resources (UDWR). We agree that this list is a good starting point. We are concerned as to how the DEIS addresses impacts of proposed alternatives and management decisions to the greater sage grouse, white-tailed prairie dog, and all seven species of fish addressed in the DEIS. All of these species are considered "focal species" by the Heart of the West Conservation Plan (which is discussed in further detail below).	Please see general comment response #65
The Wilderness Society	Special Status Species	USFWS identified 18 special status plant species that are known to occur in the Resource Area (Table 3-11, 3-24 to 3-25). We recommend that BLM indicate the allotments associated with habitat for these species, the necessary condition of this habitat if it is to meet the needs of these species, and (by allotment) whether that habitat today functions adequately to meet the needs of the species described in Table 3-12. Any critical habitat for listed species should be presented and management practices described that meet the need for species recovery. The draft RMP proposes to continue grazing at current levels of use for most allotments. It would help to show which	Please see general comment response #65

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		allotments have important habitat for species at risk and if the plan proposes action to address this need.	
The Wilderness Society	Vegetation	According to the Wyoming Game and Fish Department (1995), "Revegetation should include native plant species, preferably a mix of species which occur on site. Seed mixtures should be tailored to soil and topography - one seed mixture may not suffice throughout a large site" (p. 14). For the benefit of sage grouse, Connelly et al. (2000) recommended reseeding with native species, and adding sagebrush to the seed mixture. Zemetra et al. (1983) recommended Indian ricegrass, a species native to the Price Resource Area, for mine reclamation due to its tolerance to grazing and infertile soils. In the Final RMP, only native species should be allowed for reseeding.	Seed mixtures used for reclamation are designed to prohibit or reduce the invasion of noxious weeds and to re-establish perennial vegetation. Seed mixtures are tailored to soil and topography. A native seed mix with a local or regional source of seed is preferred in areas with very little or no non-native plants. In some instances, non-native seed is preferred to aid in the establishment of the seeding, particularly in areas that already have large areas of non-native plants.
The Wilderness Society	Vegetation	Reclamation should take into account the vegetation community extant on the site prior to development, and re-create that mixture and distribution pattern of plants when reclamation occurs.	Seed mixtures used for reclamation are designed to prohibit or reduce the invasion of noxious weeds and to re-establish perennial vegetation. Seed mixtures are tailored to soil and topography. A native seed mix with a local or regional source of seed is preferred in areas with very few or no non-native plants. In some instances, non-native seed is preferred to aid in the establishment of the seeding, particularly in areas that already have large areas of non-native plants.
The Wilderness Society	Visual Resources	Exceptions to the requirement for surface disturbing activities in VRM Class II areas to comply with requirements to retain the existing character of the landscape maybe granted such that "[t]emporary exceedence maybe allowed during initial development phases." However, there is no limit on the time for which this will be allowed, how such exceedance will be ensured to be temporary, or on the type of exceedance that will or will not be permitted.	Please see general comment responses #134 and #135
The Wilderness Society	Wilderness	We maintain that the April 2003 settlement agreement between Secretary Norton and the State of Utah (in which BLM abdicated its authority to designate any additional Wilderness Study Areas - WSAs) is invalid and will ultimately be overturned in pending litigation. As a result, we believe that BLM can and should continue to designate new WSAs. However, we recognize that the Price Field Office is operating under current guidance that directs BLM not to identify new WSAs. Nonetheless, both existing law and current guidance provide for BLM to identify and protect lands with wilderness characteristics.	Please see general comment response #36
The Wilderness Society	Wilderness	Through management plans, BLM can and should protect wilderness character in the public lands through various management decisions, including by excluding or limiting certain uses of the public lands, See 43 U.S.C. § 1712(e). This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness characteristics (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).	Please see general comment response #36
The Wilderness Society	Wilderness	e. The Draft RMP/EIS does not adequately protect wilderness characteristics; BLM should include management designations and prescriptions that will specifically protect these lands.	Please see general comment responses #36, #113 and #116

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		Scoping comments submitted by TWS and others included detailed proposals and significant new information on areas with wilderness characteristics. For example, the February 15, 2002, scoping comments submitted by SUWA, TWS, and others included new information on all of the Non-WSA Lands with Wilderness Characteristics and Non-WSA Lands Likely to Have Wilderness Characteristics. BLM has acknowledged the characteristics of these lands. See, e.g., Draft RMP/EIS p. 3-39 and Map 3-27. In addition, BLM acknowledges that "[m]any of the plan decisions affect lands likely to have wilderness characteristics" and discusses the anticipated impacts to Non-WSA Lands with or Likely to Have Wilderness Characteristics from the various management alternatives. Draft RMPIEIS, pp. 4-480 - 4-484. However, despite these findings and the agency's commitment and obligation to protect lands with wilderness characteristics, BLM has failed to take adequate action to protect these lands in the preferred alternative or the other management alternatives.	
The Wilderness Society	Wilderness	BLM finds that oil and gas development will adversely impact natural character of Jack Canyon, Turtle Canyon, and Desolation Canyon under all of the alternatives, although BLM asserts that some of this impact would be reclaimed over in the "long term." Draft RMP/EIS, pp. 4-480 - 4-481. BLM also finds that oil and gas development will have an adverse impact on opportunities for solitude and primitive recreation in Non-WSA Lands with or Likely to Have Wilderness Characteristics and could actually eliminate such opportunities altogether. Draft RMP/EIS, p. 4-482. While these' are substantial impacts, they do not take into account the risk to other lands with wilderness characteristics. BLM's analysis is limited to those Non-WSA Lands with or Likely to Have Wilderness Characteristics in the Tavaputs Plateau, which the Draft RMP identifies as an area with high potential for the occurrence of energy resources. Draft RMPIEIS, p. 4-480. BLM therefore declines to consider the potential impacts of oil and gas development on the remaining lands with wilderness characteristics, even though these lands are not closed to oil and gas development.	The impacts analysis is based on a set of assumptions and reasonably foreseeable development (RFD) scenarios. Except for the Tavaputs Plateau, development in other non-WSA areas with or likely to have wilderness characteristics would be extremely low, resulting in little if any impact to wilderness characteristics. The RFD has been revised and integrated into the Proposed RMP/Final EIS. Section 4.2.11 of the Proposed RMP/Final EIS is an expanded analysis of impacts on non-WSA lands with wilderness characteristics. Also see general comment response #36.
The Wilderness Society	Wilderness	BLM also acknowledges impacts on Non-WSA Lands with or Likely to Have Wilderness Characteristics from ORVs, noting that their "presence and noise" would have an adverse impact on opportunities for solitude and primitive recreation during ORV use. Draft RMP/EIS, p. 4-483. Once again, this analysis, while identifying important impacts, limits its scope by failing to consider the risk to natural character from ORV use, such as through distribution of non-native species and illegal cross-country use. Further, BLM's assumption that opportunities for solitude and primitive recreation can somehow be only temporarily affected by the presence of ORVs is completely unreasonable - in actuality, the noise and presence of ORVs effectively preclude such opportunities.	Assumptions for impact analysis on Draft RMP/EIS page 4-312 state that "OHV use will occur consistent with OHV area and route designations." As such, analyzing the unknown potential for "illegal cross-country use" is not consistent with this assumption. Impacts to vegetation from OHV use are noted on Draft RMP/EIS page 4-377 and include discussion on impacts to the spread of noxious and invasive plant species. Additionally, the presence of invasive species is not considered an impact to an area's appearance of naturalness that an average person would be able to identify. The Draft RMP/EIS, on page 4-483, notes that the presence and noise of OHV use would adversely impact opportunities for solitude and primitive recreation. However, if no motorized use is present in non-WSA areas with- or likely-to have wilderness characteristics, these impacts would not be present. Section 4.2.11 of the Proposed RMP/Final EIS is an expanded analysis of impacts on non-

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			WSA lands with wilderness characteristics. Also see general comment response #113.
The Wilderness Society	Wilderness	Despite recognizing the significant impacts that oil and gas development and ORVs will have on the identified lands with wilderness characteristics, BLM does not provide any specific management designations for lands with wilderness characteristics. In fact, although they are identified and discussed in Section 3 "Affected Environment" and Section 4 "Environmental Consequence," these lands are not even mentioned by name at all in the Section 2 "Management Alternatives." BLM has identified almost one million acres of lands with wilderness characteristics and also confirmed the risks to these lands from oil and gas development and ORVs. The preferred alternative should include management of the Non-WSA Lands with and Likely to Have Wilderness Characteristics identified above that will specifically protect these lands, including closure to oil and gas development and ORVs, Visual Resource Management Class 1 designation and Recreation Opportunity Spectrum classes focusing on a predominantly natural landscape without motor vehicles and appropriate distances from the nearest points of motor vehicle access.	Please see general comment response #36
The Wilderness Society	Wilderness	BLM also claims that wilderness characteristics in certain Non-WSA Lands with Wilderness Characteristics (Devils Canyon, Hondu Country, Mexican Mountain, Muddy Creek-Crack Canyon, San Rafael Reef, Sids Mountain and Upper Muddy Creek) will be protected through management prescriptions for ACECs (Highway 1-70 Scenic ACEC, Muddy Creek ACEC, San Rafael Reef ACEC and Sids Mountain ACEC). Draft RMP/EIS, p. 4-483. However, only a portion of the Sids Mountain ACEC is closed in the preferred alternative and none of the other ACECs are closed to OHV use in any of the management alternatives. Draft RMP/EIS, pp. 4-531 - 4-535. Further the Sids Mountain ACEC is neither closed to oil and gas leasing nor subject to no surface occupancy (NSO) stipulations in any of the management alternatives. Draft RMP/EIS, pp. 4-531 - 5-535. The Highway 1-70 Scenic ACEC and Muddy Creek ACEC are subject to No Surface Occupancy stipulations and the San Rafael Reef ACEC is closed to oil and gas development in these alternatives. Draft RMP/EIS, pp. 4-531 - 5-535. These are appropriate restrictions on oil and gas development to protect wilderness characteristics and we urge BLM to apply them to protect other Non-WSA Lands with and Likely to Have Wilderness Characteristics.	Please see general comment response #36
The Wilderness Society	Wildlife and Fish	In its discussion of 'Unavoidable Adverse Impacts," BLM takes note of the impacts to wildlife and habitat from "current BLM policy to foster oil and gas development" and also of the conflicts with primitive recreationists that will be exacerbated as mineral development is increased. Draft RMP/EIS, pp. 4-23 - 4-24. However, BLM has downplayed much of these impacts upon wildlife and wilderness values by first limiting the types of impacts assessed and then by relying upon undefined and unenforceable mitigation measures to lessen impacts. It is not sufficient for BLM to merely identify impacts and then label them "unavoidable." BLM can and should fully assess the existing multiple resources and uses in the Price, Resource Area and the risk to them from potential management decisions. With this knowledge, BLM can implement and enforce necessary protective measures to fulfill the agency's mandate of multiple use and sustained yield of the varied resources found in the Price Resource Area.	Please see general comment response #159
The Wilderness Society	Wildlife and Fish	The status of or impacts to the invertebrate community is also absent from the DEIS. Given the important role invertebrates play in the ecological function of any ecosystem, this is a glaring omission. We are particularly concerned about the lack of information on bees and wasps, coleoptera, and other orders. The San Rafael desert in Utah has a highly diverse insect fauna with high levels of endemism (Davidson et al. 1996, Griswold et al. 1997, personal communication with Terry Griswold, USDA-ARS Bee Biology and Systematics Laboratory, Utah State University, Logan, UT, November 2004). It seems reasonable to assume the same is true for a large portion of the Price Resource Area.	Additional information and references on invertebrate populations within the PFO is not required at the planning level of analysis because no particular issues or concerns have been raised. Site specific inventories and impact analysis would be done when appropriate as the RMP is implemented.

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The Wilderness Society	Wildlife and Fish	b. BLM must improve its treatment of wildlife issues by first compiling information on location, trends and threats to species, then developing recovery and monitoring plans. We feel that, unfortunately, BLM has categorically failed to provide a meaningful analysis of the effects of the management alternatives on important fish, wildlife, and plants and their habitat. In order to address this major deficiency, the Final EIS/RMP must include the following items. First, it must outline exactly where known populations of sensitive species exist (or how the agency intends to survey for those species). Second, it must explain what past monitoring (through the present) tells us about the current status (including population numbers) of populations of this species in the Resource Area. Third, it must indicate what current population trends are. Fourth, it must discuss current threats facing the species. Fifth, it must provide an in-depth analysis of how each proposed land use activity in each alternative may impact each species in the Resource Area. Sixth, it must specify how the revised RMP will serve to enhance the recovery of federally threatened and endangered species and prevent other sensitive species from being federally listed (i.e., sage grouse and ferruginous hawk). Seventh, it must describe in detail the monitoring program BLM proposes that will monitor the effects of these land use changes on species of concern. As BLM knows, all federal agencies are directed to "utilize their authorities in furtherance" of the purpose of the Endangered Species Act (ESA)-which is to provide a means whereby the ecosystems upon which threatened and endangered species depend may be conserved. ESA, Sections 2(b) 2(c)(I) and 7(a)(1).3 The connection of rare and imperiled species, and the habitats they depend on, is missed over and over again in the mediocre environmental effects analysis presented in Chapter 4 of the DEIS. Above all, every single new management proposal, from oil and gas leasing in specific areas to travel plan revisions regarding ORV use, must suitably address which habitat for what species might be degraded, fragmented, developed or otherwise impacted, as well as what effect these management decisions might have on species viability and persistence in these specific areas. To accomplish this, Population Viability Analyses (PVA) would seem to be critical in order to address these issues properly. Once a PVA has been completed, BLM should identify those species most at risk and develop specific management prescriptions (ideally spelled out in conservation plans for these species) to prevent their further decline, including management actions necessary to restore degraded critical habitat to proper functioning condition. The analysis of effects of different management actions in Chapter 4 should directly address how each decision will affect these species conservation plans and/or management prescriptions for species/habitat recovery.	Please see general comment response #159
The Wilderness Society	Wildlife and Fish	To its credit, the DEIS does refer to and draw upon the U.S. Fish and Wildlife Service's Utah Field Office's Guidelines for Raptor Protection from Human and Land Use Disturbances (September 2003 revision). Unfortunately, BLM uses a wrong (outdated) version of the proposed FWS raptor BMPs: the correct version that should be used in the Final EIS is the December 2003 version. It is important that BLM directly link all management decisions that may impact raptors to the recommendations and stipulations in the December 2003 version of the FWS raptor document. There are significant discrepancies between the BMPs in the September 2003 and December 2003 versions, due to revisions made by the Service to the September version (personal communication, Dave Mills, wildlife biologist, Utah State Office). In addition to ensuring that up-to-date documents are correctly referenced and integrated into the revised RMP, BLM needs to ensure that all data layers used in the DEIS are similarly up-to-date. For example, the layer that the DEIS uses for Mexican spotted owl critical habitat is not the most recent and correct version.	Please see general comment responses #60, #63 and #64

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The Wilderness Society	Wildlife and Fish	By means of an example of issues, references, and analyses absent from the wildlife sections of the DEIS, we bring up questions and concerns relating to one of the more "high profile" species in the Price Resource Area: the greater sage grouse. UDWR estimates that the extent of occupied grouse habitat in the state of Utah has declined about 60% from the historical extent (Beck et al. 2003), and this comports with UDWR findings that since the late 1960s there have been state-wide population declines resulting in only about 13,000 adult birds known to inhabit the state today (UDWR 2002). Sage grouse are known to exist on state, private, and BLM lands in the Emma Park, Whitmore Park, Range Creek, and Gordon Creek areas. We cannot comprehend why the DEIS does not give any information on the status of these populations. The species are currently petitioned for federal listing, and detailed guidelines for sage grouse conservation and management have recently been issued by the State of Utah (UDWR 2001) and the Western Association of Fish and Wildlife Agencies in their June report, "Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats." This 600-page conservation assessment is the product of an intensive and unprecedented effort by the 11 state fish and wildlife agencies responsible for management of sage grouse populations. The effort represents the work of well over 100 individuals from the state, federal, and private sectors and the peer review of nine anonymous scientist referees selected by the Ecological Society of America. Why the Price Draft RMP fails to mention either of these documents and the relevance of their recommendations for sage grouse/habitat management to the decisions made in this DEIS is confusing to say the least.	Please see general comment response #55
The Wilderness Society	Wildlife and Fish	Similarly missing from the DEIS is an adequate analysis of how additional energy development may impact known sage grouse populations and lek sites in the Resource Area. There is voluminous information on impacts to sage grouse from various forms of resource use, including habitat loss and fragmentation and degradation stemming from energy development roads, powerlines, and artificial perching habitat for predatory birds) (UDWR 2002, Aldridge 1998, Braun et al., in press, Lyon 2000, Connelly, et al. 2000, and others). Nesting grouse are easily disturbed and readily abandon nests, and lek sites are also particularly sensitive to energy impacts. Large continuous areas of habitat that are unfragmented (i.e., by roads, Paige & Ritter 1999) are extremely important for sage grouse.	Please see general comment responses #55 and #159
The Wilderness Society	Wildlife and Fish	For each sensitive species, BLM must indicate habitat needs, current threats, areas of occupation, existing management recommendations, and provide an exhaustive analysis of possible impacts of the management decisions in the RMP.	Additional information on special status species has been added to Chapters 3 and 4.
The Wilderness Society	Wildlife and Fish	The DEIS is particularly deficient in its discussion and assessment of fragmentation of sagebrush habitat and its impact on sagebrush obligates-which can be severe, even to the point of causing local extirpation of certain species (Krick & Rotenberry 1995). The safest approach to the habitat fragmentation issue is to manage for no net loss of sagebrush steppe habitat and to maintain native vegetation communities in large and continuous stands wherever possible. The protections offered by the preferred alternative and the other alternatives in the DEIS are not adequate to protect a number of important and rare species and their habitats in the Price Resource Area. The Final RMP should allow development and human use in a way that promotes the persistence of large blocks of intact sagebrush steppe rather than allowing the continued fragmentation of sagebrush habitats until only a few functional patches of sagebrush steppe remain.	Please see general comment response #55
The Wilderness Society	Wildlife and Fish	As shown in Heart of the West, the areas of northeastern Utah, northwestern Colorado, and southwestern Wyoming are inextricably linked in an ecoregion with core habitat areas and key linkages. As a result, impacts to wildlife habitat in one part of the Heart of the West ecoregion will affect habitat throughout the ecoregion. Similarly, there are basin-wide impacts, in terms of changes to the water quantity and quality in the Green River system, and cumulative impacts to the common airshed, to which oil and gas projects in northeastern Utah,	Please see general comment response #57 and #159

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		northwestern Colorado, and southwestern Wyoming all contribute together and all of which affect the entire Heart of the West ecoregion. Because these environmental parameters share a common geography, BLM must analyze all of the impacts that affect them. Similarly, changes to the environmental parameters will affect the core habitat and linkages that are critical for survival of wildlife and vegetation in the Heart of the West ecoregion. Therefore, any analysis of cumulative impacts to the Price Resource Area must consider the impacts from reasonably foreseeable actions in the ecoregion and impacts to the remainder of the Heart of the West ecoregion.	
The Wilderness Society	Wildlife and Fish	In order to meet its regulatory obligations, BLM should evaluate and implement the environmentally protective management prescriptions contained in Heart of the West, which are also discussed in further detail below.	Please see general comment response #161
The Wilderness Society	Wildlife and Fish	In core areas, we recommend that the land manager work to reduce road density to a level that encourages return of wildlife and prevents further population loss of certain species. Such road densities will vary depending on habitat type and species in the area.	Please see general comment response #56
The Wilderness Society	Wildlife and Fish	Compatible Use Areas. Areas outside core areas and linkages, such as a majority of the lands in the Price Resource Area, allow for a higher level of activity, yet these activities must still protect land use values and productivity. All federal lands managed for multiple use are required to have use managed in a manner that provides adequate habitat for wildlife and prevents the impairment of biological productivity.	Please see general comment response #56
The Wilderness Society	Wildlife and Fish	With respect to fish and wildlife, BLM confirms that oil and development will displace wildlife, as well as reduce population, and move wildlife out of habitat (euphemistically described by BLM as "modifications to population distribution and numbers, or possible habitat abandonment"). Draft RMPIEIS, p. 4-422. BLM also notes that impacts to winter habitat could also decrease population. Draft RMP/EIS, p. 4-422. BLM then looks to various mitigation measures to conclude that the significant impacts of environmental consequences will minimize or eliminate impacts. For instance, after acknowledging the risks to fish and wildlife habitat, BLM concludes that seasonal restrictions "would minimize stress to wildlife," including impacts on raptor nest sites, sage grouse leks and wintering, calving, and lambing species. Draft RMPIEIS, pp. 4-422. However, in order for BLM to rely on mitigation, NEPA requires that BLM make a firm commitment to the mitigation and discuss the mitigation measures "in sufficient detail to ensure that environmental consequences have been fairly evaluated..." Simply identifying mitigation measures, without analyzing the effectiveness of the measures violates NEPA. Agencies must "analyze the mitigation measures in detail [and] explain how effective the measures would be ..." NEPA also directs that the "possibility of mitigation" should not be relied upon as a means to avoid further environmental analysis.	Please see general comment response #159
The Wilderness Society	Wildlife and Fish	c. The measures relied upon by BLM to mitigate the environmental consequences of oil and gas development are inadequate. As noted above, BLM relies on the application of seasonal restrictions to "minimize stress to wildlife." Draft RMP/EIS, p. 4-422. BLM also assumes that the impact of oil and gas development on wildlife habitat would be lessened by taking into account "the acreage that would be reclaimed." Draft RMP/EIS, p. 4-422. BLM also "recognizes the merit of off-site mitigation strategies for the purposes of habitat enhancement" and will "encourage willing partners to participate in off-site mitigation strategies." Draft RMP/EIS, p. 2-18. In addition, BLM commits to applying Best Management Practices (BMPs), as another means of reducing the environmental consequences of oil and gas development. Draft RMP/EIS, p. 2-18. However, the manner in which all of these measures are described and applied in the Draft RMP/EIS provides an insufficient basis for concluding that the impacts of oil and gas development will actually be mitigated.	Please see general comment responses #40, #41, #43 and #159
The Wilderness Society	Wildlife and Fish	While BLM references the use of BMPs, BLM does not define the BMPs in detail or make them mandatory. In	Please see general comment responses #40,

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		order for BMPs to be relied upon as a basis for mitigation of impacts, BLM must set out specific standards and incorporate them into lease stipulations. We would recommend that the standard lease stipulations require immediate reclamation of unused areas and commencement of initial reclamation if no production activities have taken place for six months.	#41and #43
The Wilderness Society	Wildlife and Fish	The standards that would be applied to off-site mitigation are similarly unclear. With respect to vegetation, BLM references implementation of off-site mitigation to "enable identification of a suitable mitigation method and location to best accomplish the objective of offsetting the impacting action and to ensure that benefits of the mitigation are distributed among all users and resources affected." Draft RMP/EIS, p. 2-30. In the "no action" alternative, BLM requires "1:1, acre-for-acre, offsite vegetation/habitat enhancement for any action resulting in surface disturbance to crucial value habitats (wildlife crucial ranges, suitable livestock grazing areas, wild horse ranges, and riparian wetland habitats)." Draft RMP/EIS, p. 2-33. However, the Draft RMP does not specify how off-site mitigation strategies will be developed and what standards will apply for any of the other management alternatives. Draft RMP/EIS, p. 2-33. This purported mitigation is actually a reduction of the protections currently in place and, without specific standards, has the potential to actually reduce protection for wildlife habitat.	Please see general comment responses #40, #41 and #43
The Wilderness Society	Wildlife and Fish	The stipulations that will apply to oil and gas development are set out in Appendix 16 "Oil and Gas Leasing Stipulations." However, these stipulations do not provide sufficiently definitive mitigation standards. All of the stipulations will not be applied in a variety of situations: exception (one-time exemption), modification (temporary or permanent change to restrictions), and/or waiver (permanent exemption). Accordingly, there is no certainty that these stipulations will be applied. Further, the various grounds for exemption are based on very subjective criteria.	Please see general comment responses #40 and #41
The Wilderness Society	Wildlife and Fish	Exceptions to seasonal closures may be granted "due to climatic and range conditions if activities will not cause undue stress" to the specific wildlife populations or habitats. These exceptions apply to: mule deer and elk crucial winter range, mule deer and elk crucial fawning and calving areas, pronghorn antelope crucial fawning areas, desert bighorn sheep and rocky mountain bighorn sheep crucial habitat, moose high value habitat, raptor crucial cliff nesting complex habitats, and known raptor nest sites. However, there is no definition on the conditions under which exception will be considered or how "undue stress" will be defined or required to be proved by a lessee.	Please see general comment response #42
The Wilderness Society	Wildlife and Fish	The sage grouse nesting habitat protection consists of a timing limitation that only takes effect once "direct and indirect impacts to suitable nesting cover exceeds 10% of habitat available within 2 miles of identified leks." The Draft RMP/EIS does not specify what types of impacts will be included in this assessment or how these impacts will be identified and measured. Even if they take effect, these protections are still subject to modification if operations will "allow a minimum of 70 percent of nesting attempts to progress through hatch." However, the Draft RMP/EIS does not specify how this condition will be measured, by whom, or over what period of time. Due to the subjective nature of both the protection and the modification, they will be very difficult to apply or enforce and will be subject to a wide range of bases disagreement and protest from a lessee.	Please see general comment responses #55 and #159
The Wilderness Society	Wildlife and Fish	The No Surface Occupancy Stipulation (NSO) within 1/4 mile of sage grouse leks may be modified and an exception may be granted to the timing limitation for sage grouse nesting habitat if "satisfactory compensation" to offset anticipated impacts is negotiated. Presumably, this refers to off-site habitat mitigation. However, as detailed above, the Draft RMP/EIS contains no specific requirements for a one-for-one acreage replacement or for the measures to be used to determine that proposed replacement habitat is suitable or sufficiently established prior to destruction of existing habitat. Further, the Draft RMP/EIS contains no limits on the amount of sage grouse leks and habitat that may be subject to off-site mitigation, so that all leks and habitat in the planning area could be	Please see general comment response #55

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		impacted.	
The Wilderness Society	Wildlife and Fish	Exceptions may be granted to the NSO buffers around natural springs and perennial streams if BLM deems that there are "no practical alternatives" or if "impacts could be fully mitigated." However, the Draft RMP/EIS does not include any standards for when existing alternatives are not "practical" or of how and when full mitigation will be required and completed.	Specific actions designed to protect and enhance riparian and wetland areas have been adopted and are stated in Chapter 2 of the Draft RMP/EIS (also in Appendix G of the Proposed RMP/Final EIS). As discussed in the Draft and Final EISs, riparian areas would be managed to attain Proper Functioning Condition (PFC) through whichever action is necessary as determined in site specific plans and actions. The standards referred to in the comment would be applied on a case-by-case basis as part of project level analysis and decisions may require additional and site specific consultation and/or coordination procedures which will be met prior to project approval.
The Wilderness Society	Wildlife and Fish	In order to meet the standards for mitigating impacts, lease stipulations should have more limited options for rendering them inapplicable and any such options should be based on more definitive standards. In addition, stipulations should require those seeking to avoid stipulation requirements to commit to significant ongoing monitoring and restoration activities. Stipulations to protect wildlife should not have options to obtain waivers, exceptions, or modifications.	Please see general comment responses #41, #43 and #56
The Wilderness Society	Wildlife and Fish	As a general standard for protection, the NSO within 1/4 mile of sage grouse leks is insufficient. Experts, including those recognized by BLM, have concluded that sage grouse will be affected by activities within 3 miles of their leks. Both the NSO and the evaluation of potential impacts to sage grouse from oil and gas activities should be based on this distance.	Please see general comment response #55
The Wilderness Society	Wildlife and Fish	In order to mitigate the environmental consequences of oil and gas development, BLM must use scientifically-based mitigation measures (such as the buffer for sage grouse leks identified above), define the actions to be taken, incorporate them into leases, and ensure that they will be applied and enforced.	Please see general comment responses #43, #55 and #159
The Wilderness Society	Wildlife and Fish	Spacing between wells should be at least 3 miles (6.6 km) between well pads, or a minimum well density of one well per every 640 acres for sage grouse breeding habitat. No Surface Occupancy stipulations should be mandated for areas within 3 miles of sage grouse leks, and within %2 mile of active raptor nests, important biological areas outlined by the Wyoming Natural Diversity Database and other local experts, and all sensitive plant and wildlife habitats (including ungulate crucial winter range, prairie dog colonies, sage grouse wintering grounds, wetlands, and 100-year floodplains). In addition, all human activities associated with oil and gas production (including surface disturbance) should cease between November 15 and April 15 on all big game winter ranges. We recommend shothole exploration only, hand-laying of lines in particularly sensitive areas, and banning the use of large vibrator trucks for seismic exploration.	Please see general comment response #40
The Wilderness Society	Wildlife and Fish	Recommendations for protective buffers for nests and other habitats range from a few kilometers to over 5 km (to minimize nest abandonment and prevent perching sites for raptors, to avoid sagebrush habitat fragmentation and loss, etc.).4 It is unclear why BLM has not incorporated the volumes of studies on known impacts of energy	Please see general comment responses #55, #60, and #160

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		development on grouse into the DEIS, along with other examples of stipulations and BMPs that have been recommended or used elsewhere to avoid impacts.	
Twin Cities Trail Riders	OHV Route Identification	The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unneccessarily and unfairly subjects small to mid sized non-profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. We recommend BLM stay with the proven 50-vehicle group size limit.	Please see general comment response #81
Twin Cities Trail Riders	OHV Route Identification	We are interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. We understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. We are very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. We object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of our strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use. The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative.	See general comment responses #19, # 20, #31 and #37
Twin Cities Trail Riders	OHV Route Identification	We are interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. We understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. We are very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. We object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative.	Please see general comment responses #20 and #31
Twin Cities Trail Riders	OHV Route Identification	Please make note of our strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	Please see general comment response #19
Twin Cities Trail Riders	OHV Route Identification	The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use.	Please see general comment responses #19, #20 and #31
Twin Cities Trail Riders	Process and Procedures	We do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. We oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment response #37
Twin Cities Trail Riders	Recreation	Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed	Please see general comment response #81

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		campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. We do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. We oppose the management 'layers' outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	
Twin Cities Trail Riders	Recreation	BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non-profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. We recommend BLM stay with the proven 50-vehicle group size limit.	Please see general comment response #81
Twin Cities Trail Riders	Recreation	It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D.	Please see general comment response #81
U.S. Environmental Protection Agency	Air	Section 4.2.2, page 4-4: This section on Projects and Activities Considered addresses reasonably foreseeable development in the area and discusses possible changes in existing projects. The DEIS relies on the Air quality Baseline and Analysis Report for information on emissions, which describes 1996 emissions in the area but does not estimate future emissions. Please include estimates of potential future changes in emissions in the project area either in the FEIS or the Air Quality Baseline and Analysis Report. Also, please check some of the information regarding emissions in the Air Quality Baseline and Analysis Report For example, the statements on page 8 of the report that Emery County has NOX emissions approximately ten times greater and CO emissions approximately six times greater than in Carbon County appear to be in error. Also, the 24-hour background concentration for PMI0 shown in Table 4 (page 22) of the report should be corrected from13 µg/m3, which was the annual average, to 30 µg/m3, which was the maximum 24-hour concentration (see page 7 of the report).	The Revised (Final) Air Quality Baseline Report (AQBR; 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 Proposed RMP/Final EIS air quality affected environment and impact sections more accurately describe potential air quality impacts from the various alternatives.
U.S. Environmental Protection Agency	Air	Section 4.4.2, page 4-7: The paragraph on the North Horn Coal Mine reads, in part, "Increases in air emissions are anticipated and discharge would degrade water quality." This is one of the few references to possible air quality impacts from coal development in the Draft EIS. Although the area of the PFO has coal resources, as explained in section 3.3.5.2 and Appendix 25, the Draft EIS contains little information on the potential for air quality impacts if increased coal production occurs. Chapter 2, Alternatives, suggests that coal production would be practically identical under all alternatives except the No Action Alternative (see page 2-97 of the DEIS). If so, please explain; otherwise, please include more information on coal production and corresponding emissions under the alternatives.	Chapter 4, Section 4.2.1 provides additional details on assumptions related to coal mining. The No Action emissions projections take into consideration coal mining at 20 million tons per year.
U.S. Environmental Protection Agency	Air	Section 4.4.2, page 4-8: A sentence in the paragraph on the Price Coal Bed Natural Gas Project reads, "Operation of the compressor stations would cause an increase in NOx and carbon monoxide (CO) concentrations, but approval is required from the Utah Department of Environmental Quality (UDEQ)." Similarly, a sentence in the paragraph on the Ferron Natural Gas Project reads, "Emissions of nitrogen oxides from the compressor stations would contribute to regional haze and reductions in visibility." We appreciate these disclosures; however, other portions of the Draft EIS emphasize the trend toward electrification of the two gas fields (for example, see the last sentence on page 4-1 1). From our reading of the DEIS and the Air Quality Baseline and Analysis Report, Price Field Office, Resource Management Plan, we infer that: 1) electrification of compressor engines is not necessarily universal at least in the Ferron field. (2) the coal bed natural gas projects contain other emission sources that were not eliminated by electrification, (3) the remaining emissions have not been quantified for the current DEIS, and (4) due to lack of regulatory authority, BLM is not certain whether electrification will continue to apply to future development in the gas fields. Please include more detail and clarify	The Revised (Final) Air Quality Baseline Report (AQBR; 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 take into account additional drilling activities in the coal bed natural gas fields. These calculations are the best estimate given existing conditions which includes electrification of the fields.

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		the control of air contaminant emissions from coal bed natural gas development in the FEIS.	
U.S. Environmental Protection Agency	Air	Section 4.2.3.1, page 442: The first paragraph of this page discusses, among other possible air impacts under the no-action alternative, the "localized and temporary" effects of fugitive dust from roadways. As in the corresponding paragraphs regarding the air impacts of the other alternatives, fugitive dust is cited as an insignificant contributor to regional haze. Other portions of the DEIS refer to fugitive dust but do not emphasize the PMI0 standard. (For example, see the fourth paragraph under "Methods of Analysis" on page 4-28 and page 11 of the Air Quality Baseline and Analysis Report, Price Field Office, Resource Management Plan) Emissions of road dust can contain some fraction of fine particles and the suggestion that the coarse fraction has "little health effect" is unsupported. We are concerned that the DETS does not address possible near-field impacts of fugitive dust that would have a greater potential to approach a NAAQS for particulate matter (such as the 24-hour standard for PKO) than a regional haze threshold. Please discuss potential near-field impacts of fugitive dust in the FEIS.	In the Proposed RMP/Final EIS Section 4.2.1 more accurately describes potential air quality impacts including fugitive dust. This section has also includes emissions calculations from the AQBR (2008).
U.S. Environmental Protection Agency	Air	Section 4.2.3.3, page 4-16: The section deals with cumulative air quality impacts under Alternative B. The first sentence of the page indicates that development and emissions would continue but would be "less than continuing the current situation," presumably referring to the no-action alternative. Given the anticipated development of 70 wells per year under Alternative B and 60 wells per year under the no-action alternative, it is unclear how collective impacts would be reduced under Alternative B (see the comment below regarding well development rates described in the Executive Summary). Please revise and clarify this matter in the Final EIS.	The analysis in the Draft RMP/EIS is correct. The table in the Executive Summary is incorrect. Table 4-2, which anticipates 77 well pads per year for No Action and 70 well pads per year for Alternative B is correct. Because there would be a reduction of 7 wells per year impacts would be reduced.
U.S. Environmental Protection Agency	Air	Section 4.2.3.5, page 4-20: Similarly, Alternative D is described as having air quality impacts less than the current situation, whereas the well development rate shown in the Executive Summary is 75 wells per year compared to 60 under the no-action alternative. Please revise and clarify this matter in the Final statement.	The analysis in the Draft RMP/EIS is correct. The table in the Executive Summary is incorrect. Table 4-2 which anticipates 77 wells per year for No Action and 70 wells per year for Alternative B is correct. Because there would be a reduction of 7 wells per year impacts would be reduced. The RFD for the Proposed RMP has been revised based on more recent trends in the potential for oil and gas development.
U.S. Environmental Protection Agency	Air	Page 4-27: The third bullet in the list of conclusions reads, "Flaring and venting of natural gas wells causes occasional impacts to air quality." A sentence in the Air Quality Baseline and Analysis Report reads, "The emissions from flaring were not considered to be significant." The Ferron FEIS cited a scenario in which wells would be flared approximately ten days per year, resulting in a collective NOx, emission rate of 2.8 tons per year or approximately 0.4 to 1.3 percent of the NOx, emissions from the project's compressors (a ratio that does not apply because most compression in the field has been electrified). The Air Quality Baseline and Analysis Report and the Ferron FEIS did not discuss venting, or direct release of hydrocarbons to the atmosphere, in detail. Please describe the potential air impacts of venting and flaring in the FEIS for the Price RMP, and discuss whether either BLM or the State of Utah have considered flareless flowback or similar technology as a form of mitigation to avoid emissions associated with direct flaring.	Flaring and venting emissions were taken into consideration in the projection of emissions for the PFO in the AQBR 2008.
U.S. Environmental Protection Agency	Air	Page 4-27: The fourth bullet in the list of conclusions refers to considering future demands on the air resource on a case-by-case basis. While citing air quality assessments that were conducted for the Ferron and Price coal bed natural gas projects, this DETS for the Price RMP treats air quality in a general, qualitative fashion. It is important to assign responsibility for project-specific air quality analyses to future planners. We recommend that the FEIS contain wording similar to the following excerpt from the Rawlins, Wyoming draft RMP/EIS, which used a	The Revised (Final) Air Quality Baseline Report (AQBR; Booz Allen Hamilton, 2008) calculates emissions by alternative, allowing comparison between alternatives. This includes updates to existing climate and air quality conditions as well as

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		comparative, emissions-based approach: As project-specific developments are proposed, quantitative air quality analysis would be conducted for project-specific assessments performed pursuant to NEPA. We recommend dele ting or revising the related seventh bullet, which says that BLM actions would probably not require "regional-scale modeling." Possibly BLM means to indicate that the scope of projects that are anticipated will not likely justify regional-scale modeling, but it is unclear what the term means in this context. The air quality assessments for both the Ferron and Price coal bed natural gas projects addressed far-field impacts. BLM did not conduct dispersion modeling specifically for the Price RMP; however, there should be a discussion of possible future changes in emissions and their potential impacts (see related comment above). Also, NEPA requires an assessment of cumulative impacts which, for large-scale energy projects, generally requires modeling of other sources in addition to the project. If BLM receives any applications from the industry for projects significantly larger than anticipated under the identified well development rates shown in the Executive Summary, regional-scale modeling might then be needed.	recognition of the most current and relevant regulatory framework. In addition, emissions are also compared to other sources in and nearby the Price Field Office planning area. Since the BLM cannot determine with reasonable certainty a number of parameters, it is not appropriate to model. The uncertainty of the modeling results from such an exercise would render the results useless.
U.S. Environmental Protection Agency	Air	Page 4-29: The first issue discussed under the Impact Analysis refers to servicing air monitoring stations. Aside from this reference, the DEIS does not address air monitoring. If BLM intends to add air monitoring stations in the area, please describe the monitoring program in sufficient detail to ascertain the locations and objectives of the monitoring efforts.	BLM does not plan to conduct any air monitoring or install any monitoring stations. This statement does not appear in the Proposed RMP/Final EIS.
U.S. Environmental Protection Agency	Cultural Resources	Page 4-95: This section summarizes the required cultural resource inventories necessary prior to initiating surface disturbance for oil and gas development activities. We understand that the Ute Tribe helps assure that employees of these companies do not disturb cultural resources by restricting vehicle access to improved rights of way at all times for employees of the industry. BLM could consider this and other potential mitigation methods and assess their advantages and disadvantages in the Final EIS.	Please see general comment response #9
U.S. Environmental Protection Agency	Livestock Grazing	Drought conditions have affected native range conditions in the PFO to a considerable extent. Prolonged drought conditions stress native plant communities and favor non-native plant communities potentially more prone to fire. In the past, BLM has altered its management practices in Utah during prolonged drought such as removing cattle to protect conditions in grazing allotments. We suggest that the Final EIS consider various management techniques, including reducing vehicular access to protect natural resources during prolonged drought conditions.	Please see general comment responses #12 and #33
U.S. Environmental Protection Agency	Minerals and Energy Resources	EPA recommends that additional attention be considered to the use of leasing lands with the No Surface Occupancy (NSO) lease stipulation as addressed in Alternative C; the alternative designed to provide the maximum conservation and protection of natural resources from mineral and energy development. We recommend that BLM apply NSO lease stipulations consistent with Alternative C because if the industry is capable of development using horizontal drilling, BLM could attain additional recovery of the oil and gas resources and provide increased protection of the natural resources in these nationally-unique canyon lands. On the other hand, if resource recovery using horizontal drilling techniques is not technically feasible, then BLM could remove the NSO stipulations at a later date following public review.	See general comment responses #16 and #154. The Draft and Final RMP/EISs evaluate a range of alternatives to assure a balanced approach that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production is considered. The management actions proposed in the Proposed RMP/Final EIS are designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Directional or horizontal drilling is considered where possible and is one of many mitigation measures used in the planning

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			area. However, directional drilling is not always possible given geology and certain technical issues. The drilling company in consultation with BLM ultimately decides the method of drilling.
U.S. Environmental Protection Agency	Minerals and Energy Resources	Page 4-4: The Draft EIS recognizes that minerals and energy activity presents the greatest potential for significant impacts in the area. The Draft RMP attempts to balance oil and gas development within natural landscapes especially those of wilderness quality. The concern is whether the environmentally protective efforts, some of which are discretionary such as riparian buffers or timing exclusions, will be applied and if they are removed whether there will be an opportunity for public to review such changes in BLM's decisions. Because of discretionary language the public has no assurance that resources would be protected on lands open without NSO lease stipulations.	The management actions contained in the Proposed RMP/FEIS allow minerals and energy exploration and production while protecting other resource values. Impacts from proposed mineral and energy exploration and production will require additional NEPA analysis. At the time of site-specific NEPA analysis the public will have an opportunity to comment on and have input on energy proposals and any mitigation developed during the NEPA process. The criteria for exception, modification and waiver are presented in Appendix G of the Proposed RMP/Final EIS.
U.S. Environmental Protection Agency	Minerals and Energy Resources	We are particularly concerned that BLM exceptions may be granted to NSO buffers for natural springs and streams if BLM deems that there are "no practical alternatives" for a project Therefore, we recommend that the historical practice and process of the PFO removing environmentally protective restrictions on oil and gas development be addressed in the Final EIS. The Final EIS should specify BLM's plans to provide for public review of any proposed actions that would remove oil and gas development restrictions in the future.	Public review is a standard and required practice of BLM when a proposed action is analyzed in the NEPA process either by an EA or EIS. The potential modification of restrictions on oil and gas lessees would be fully analyzed in the NEPA process and full public participation would take place.
U.S. Environmental Protection Agency	Minerals and Energy Resources	As noted in our cover letter, we specifically recommend BLM consider additional application of NSO lease stipulations on highly valued lands as already identified in Alternative C. NSO leasing would allow later analysis at the project level to determine if specific impacts would require retaining NSO conditions or, if development with surface occupancy could occur without significant impacts. We recommend that BLM apply NSO lease stipulations because if the industry is capable of completing development using horizontal drilling, BLM could attain both the maximum recovery of the leased oil and gas reserve and provide additional protection of the natural resources in the nationally-unique canyon lands managed by the PFO. On the other hand, if resource recovery using horizontal drilling techniques is not technically feasible, BLM could later remove the NSO stipulations following public review at the project-level stage of analysis.	Please see general comment responses #16, #18, and #154
U.S. Environmental Protection Agency	Minerals and Energy Resources	Page ES-8: The column headings in the table showing the Alternatives Comparison include estimates of well development rates for the alternatives. The DEIS does not give details about these well development rates, including whether BLM expects that the estimated increases would occur in oil, natural gas, or coal bed natural gas wells. Please include information on the well development rates in Chapter 2 and in the subsections on collective and cumulative impacts that follow section 4.2.3.	See general comment response #53. The Reasonable Foreseeable Development (RFD) estimate does not distinguish between conventional oil and gas wells and coalbed natural gas wells. Coalbed natural gas wells are subject to the same rules and regulations as conventional gas wells.
U.S. Environmental Protection Agency	OHV Route Identification	We commend the BLM for limiting motorized travel and recreation to designated trails, and we fully support the closure and rehabilitation of existing excess, redundant and damaging routes. Restricting cross-country recreation has the potential to greatly improve conditions of known and unknown sensitive resources as well as user-experiences in this area. When OHV recreation occurs in areas that have not been designated as	Please see general comment response #19

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		appropriate for this type of activity, impacts often result that are expensive, time-consuming, and sometimes impossible for the land management agency to repair. Impacts that will be avoided through this decision include noxious weed establishment and spread, trampling and compaction of soils and vegetation, rutting of wetlands, disturbance and displacement of wildlife and livestock, damage to cultural resources, impacts to water quality, riparian and fisheries habitats Recognizing that finishing the analysis and trail system designation is likely to require additional time beyond the schedule of this RMP EIS, we recommend that the BLM consider temporarily closing all inventoried routes that have not yet undergone environmental review and formal use designation. The action of restricting cross-country travel will increase the use of designated routes as recreationists are concentrated to them, and therefore use-related impacts are likely to intensify. Because such routes are generally user-created, impacts are generally unknown and may be more costly to remedy in the future. Although the assumption is that the major impacts occurred when the ground was originally scarred, this may not be the case in areas where sensitive habitat, soils or aquatic ecosystems exist.	
U.S. Environmental Protection Agency	OHV Route Identification	Page 1-11: The 2003 San Rafael Motorized Route Designation Plan is incorporated by reference into this RMP and Draft EIS. However, this results in confusion since the maps of the proposed route designations included in the Draft RMP do not depict the motorized routes as designated in the San Rafael plan. We recommend that the routes selected in the San Rafael travel plan be included in the Final RMP and specifically show where these routes may conflict with high value special use lands.	Please see general comment responses #20 and #31
U.S. Environmental Protection Agency	OHV Route Identification	Page 3-48: Management of off-road vehicle (ORV) use has become a significant issue within the PFO. ORV use on public lands managed by the PFO has increased significantly over the past two decades. As the Draft RMP states: "OHV use is perceived as the fastest growing activity in the PFO." There are currently more than 3,500 miles of designated OHV routes in the PFO. Of particular concern is the rapid increase in undeveloped new ORV routes created by recreationists which results in ORV use on lands that were previously free of motorized vehicle use. The increasing demand by users and the increased capability of vehicles to travel difficult terrain is likely to make it difficult for BLM to manage this recreational activity effectively. This RMP, including the ORV management and travel plan portion of the plan, needs to demonstrate how it will comply with the national goal to minimize damage as defined in Executive Orders 11644 and 11989. The broad direction to OHV managers under these Executive Orders is to locate OHV areas and trails to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands. We specifically recommend that the Final EIS and RMP examine the role OHV recreation plays in dispersing non-native and exotic plants and contributes to fire risks.	Please see general comment responses #19, #23 and #24
U.S. Environmental Protection Agency	OHV Route Identification	Page 3-49: There are several alternatives for ORV route designations but these alternatives do not evaluate the management option of precluding ORV use in wilderness study areas, proposed wilderness areas, areas that the PFO has found have wilderness character and other sensitive areas. Further, none of the alternatives in the Draft RMP addresses in detail non-motorized recreation and trails. We suggest that the Final EIS consider the advantages of resource protection afforded by precluding ORV in special management areas and address non-motorized recreational areas and trails.	Please see general comment response #12 and #36
U.S. Environmental	Process and	EPA evaluates the potential effects of a Proposed Action and the adequacy of information in a Draft EIS. The	Please see general comment response #123

Organization	Category	Comment	Response
Protection Agency	Procedures	Proposed Action and Preferred Alternative (Alternative D) is rated by EPA as "EC-2" under EPA's ratings criteria, which is enclosed. The "EC" rating means that our review identified several environmental impacts that should be avoided to fully protect the environment (Environmental Concerns, or "EC"). The EC rating is based on EPA's concerns regarding the potential impacts to aquatic resources, water quality, air quality, sensitive and rare wildlife, soil erosion, recreation resources and experiences, and wildlife habitats. The potential for significant environmental degradation could be reduced by analyzing and incorporating the following options for alternatives: • reduce the intensity number of animals (AUM) and duration of livestock grazing; and vehicular access for oil and gas development and OHV recreation during prolonged drought conditions; • preclude access of off-highway vehicles (OHV) in wilderness study areas, proposed wilderness areas, areas that the PFO has found to have wilderness character and other sensitive areas; • include additional lands with the NSO lease stipulation to avoid resource damage and maximize resource recovery if horizontal drilling can be completed; • and specify the control of air contaminant emissions using electrified compressor stations associated with coal bed natural gas development. A "2" rating means that the DEIS has insufficient information to thoroughly assess environmental impacts. Quantitative estimates of future conditions, or relative differences in qualitative estimates of those conditions showing change in conditions over time would be helpful to understand the impacts to air quality, wildlife habitats, vegetation, water quality, and other environmental resources. Because fugitive dust conditions could approach the National Ambient Air Quality Standards (NAAQS) or particulate matter, additional information on fugitive dust conditions should be provided in the Final EIS as suggested in our enclosed comments.	
U.S. Environmental Protection Agency	Soil, Water and Riparian	Page 3-18: This section describes the invasive and noxious plants on public lands within the PFO. Two of these plants: musk thistle (Cardus nutans) and Russian knapweed (Centaruea rapens) have infestations that are increasing about 10 percent and 5 percent annually respectively. This data is from a 1997-1998 inventory. What is the current trend for these infestations? Have the other invasive and noxious weeds listed here remained stable as claimed? No trend data is provided for any of the six poisonous plants listed on Table 3-7. We understand that the oil and gas developers on the Myton Bench are finding it difficult to control the spread of the poisonous and noxious weed Halogeton (Halogeton glomeratus) due to land disturbance primarily associated with oil and gas development. (Personal communication, Manual More, BIA, October 2003.) We recommend that the Final EIS include: 1) the location of these weed infestations within the PFO, 2) the trend in these infestations, 3) specific mitigation on oil and gas leases, and 4) the annual budget available to the counties and BLM for invasive plant control.	Table 3-6 in the Draft RMP/EIS and 3-8 in the Proposed RMP/Final EIS list invasive and noxious plant species within the PFO and describe the general trends for these plants. Poisonous plants are not addressed in the Proposed RMP/Final EIS because no management actions are planned to eradicate or control poisonous plants within the planning area.
U.S. Environmental Protection Agency	Soil, Water and Riparian	Page 4-33: The table indicates that some streams used for water-based recreation such as the San Rafael River and Nine Mile Creek would continue to have poor water quality under all alternatives and that recreationists exposed to high concentrations of fecal coliform could risk infections. However, the water quality is these streams is adequate for public contact and does not contain high concentrations of fecal coliform bacteria. Table 3-2 on page 3-9 lists the 6 segments of streams within the PFO that do exceed water quality standards and are listed in Utah's Clean Water Act Section 303(d) list. Nine Mile creek exceeds temperature criteria necessary for fishery protection and the other streams primarily exceed the salinity criteria for aquatic life. We suggest that the Final EIS update the information on these 303(d) listed streams and identify the planning by conducted by the Utah Division of Water Quality on these streams to achieve water quality standards.	Please see general comment response #72

Organization	Category	Comment	Response
U.S. Environmental Protection Agency	Soil, Water and Riparian	Page 4-35: A 660-foot buffer zone of no surface disturbance is to be maintained around natural springs to protect water quality. It will be difficult to assure protection of these unique resources if the impact to a natural spring results from activities beyond this buffer zone, such as dewatering necessary for coal bed natural gas wells. We suggest that the Final EIS consider modifying BLM' s alternative in this regard and BLM select the option of discouraging all development of natural springs as identified for Alternative C.	Please see general comment response #70
U.S. Environmental Protection Agency	Soil, Water and Riparian	Page 4-45: The proposed buffer zone around riparian and wetland habitats is to preclude new surface-disturbing activities within the 100-year flood plain or within 330 feet of riparian areas. However, an exemption can be authorized by BLM "if it can be shown that the project as mitigated eliminates the need for the restriction." We suggest the final EIS clarify if this type of surface occupancy exemption has been granted in the past within the PFO and the nature of that mitigation and any public review process associated with the granting of such exemptions. As the goal of avoiding such surface disturbance in riparian lands is based on avoiding the cumulative impact of such actions, BLM should also clarify if such exemptions might be restricted based on the cumulative effects of all similar actions in any one riparian area.	Please see general comment response #70
U.S. Environmental Protection Agency	Wildlife and Fish	Page 2-18: Best Management Practices are to be applied on all new and existing oil and gas leases as consistent with the lease rights that have been granted. However, BMPs are generally negotiated with the operator and therefore it is not clear whether any specific BMP practice will remain part of the lease conditions. The use of off site mitigation strategies for the purposes of habitat enhancement runs the risk of destroying natural habitats in exchange for human-created habitats on uncertain quality. The Draft RMP does not clearly address how off-site mitigation strategies will be developed and what standards will apply.	Please see general comment responses #43 and #54
U.S. Fish and Wildlife Service	Alternative Maps	FWS, 3, 3-26, 3.2.7.2 Special Status Fish & Wildlife: The EIS should identify any Mexican spotted owl Protected Activity Centers in the PFO; management of these areas should occur in accordance with the Mexican Spotted Owl Recovery Plan.	Section 3.2.7 of the Proposed RMP/Final EIS states that Designated critical habitat was established for the Mexican spotted owl in 2001 and revised in 2004. For 11 canyon habitats, the primary constituent elements include one or more of the following attributes: (1) cooler and often more humid conditions than the surrounding area; (2) clumps or stringers of trees and/or canyon walls containing crevices, ledges, or caves; (3) a high percentage of ground litter and woody debris; and (4) riparian or woody vegetation. The primary constituent elements related to forest structure include: (1) a range of tree species; (2) a shade canopy created by the tree branches, covering 40 percent or more of the ground; and (3) large, dead trees with a trunk diameter of at least 12 inches (69 FR 53181- 5398). The PFO contains 160,400 acres of designated critical habitat for the Mexican Spotted Owl on BLM managed land and four proposed Protected Activity Centers (PAC). Map 3-6 is general in nature to protect sensitive species.
U.S. Fish and Wildlife Service	Alternative Maps	FWS, Map 41, Map 6, 40-41, Maps in Volume 2, Map 41: Areas of Past Coal Mining and Potential Future Mining, and Map 6: Known Recoverable Coal Resource Areas (KRCRAs), and Federal Coal Leases in the Planning Area:	The maps in the Proposed RMP/Final EIS are presented in color to improve the usability of the

Organization	Category	Comment	Response
		All maps should be in color, but in particular, both of these maps.	documents.
U.S. Fish and Wildlife Service	Fire and Fuels Management	FWS 2 2-53 Fire & Fuels Management; General Restrictions: Ensure the RMP is consistent with restrictions imposed by the statewide BLM LUP Amendment.	The RMP states (p.2-53) that restrictions on fire management "would be identified in the Fire Management Plan." Fire management decisions for the Price Field Office are included in the Moab Support Center Fire Management Plan (FMP). The Moab FMP will include all resource protection measures / restrictions that were developed for the Statewide BLM LUP Amendment (formally known as the Utah Land Use Plan Amendment for Fire and Fuels Management Environmental Assessment, UT-USO-04-01)as well as for the Moab FMP. Therefore, by incorporating decisions made in the proposed FMP, the Price RMP would be consistent with the restrictions included in the Utah LUP Amendment for Fire and Fuels Management.
U.S. Fish and Wildlife Service	Fire and Fuels Management	FWS, 4, 4-217, Fire & Fuels Management; Impacts to Special Status Species: 2nd sentence states, "In general, prescribed fires would have long-term effects on by [sic] diversifying..." We recommend that you state that if effects from treatment options will be measurable, consultation will be initiated with the Service, in accordance with the ESA.	Management decisions under Special Status Species and Planning Criteria accommodate consultation efforts with implementation activities.
U.S. Fish and Wildlife Service	Fire and Fuels Management	FWS 4 4-220 Fire & Fuels Management; Desired Condition Class; Impacts to Special Status Species (and to Fish and Wildlife): Moving toward vegetation Condition Class 1 seems likely to have significant beneficial effects to fish and wildlife (including special status species). While the actions needed to achieve CC1 may have some short term negative effects (e.g. fuels reduction, prescribed fires), the long-term effects should be beneficial to native species that are adapted to the historical fire regime.	The impacts of Fire and Fuels management on wildlife and special status species are addressed in Sections 4.2.7 and 4.2.8 in the Proposed RMP/Final EIS. The analysis recognizes Using fire and mechanical/biological/chemical treatments to achieve desired vegetation could result in a healthy mosaic of communities used by a variety of species, including the necessary habitat components for Special Status Species. Conducting vegetation treatments to maintain and achieve *Utah Standards for Rangeland Health* would move vegetation communities toward improved ecological health and rangeland conditions that may provide the necessary habitat components for Special Status Species. It also states that wildland fire could affect wildlife and its habitats by converting late-seral structure vegetation to early and mid-seral structure vegetation. This would increase diversity in habitat, forage, and cover. In late-successional structure

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			vegetation communities, fire would return the vegetation community to an earlier structural stage of succession. This conversion could displace species adapted to late-seral structure vegetation types in local areas.
U.S. Fish and Wildlife Service	Fire and Fuels Management	FWS, 4, 4-265, Forest and Fuels Management; Other Decisions and Impacts Analysis; General Restrictions: Ensure the RMP is consistent with restrictions imposed by the statewide BLM LUP Amendment.	The RMP states (p.2-53) that restrictions on fire management "would be identified in the Fire Management Plan." Fire management decisions for the Price Field Office are included in the Moab Support Center Fire Management Plan (FMP). The Moab FMP will include all resource protection measures / restrictions that were developed for the Statewide BLM LUP Amendment (formally known as the Utah Land Use Plan Amendment for Fire and Fuels Management Environmental Assessment, UT-USO-04-01)as well as for the Moab FMP. Therefore, by incorporating decisions made in the proposed FMP, the Price RMP would be consistent with the restrictions included in the Utah LUP Amendment for Fire and Fuels Management.
U.S. Fish and Wildlife Service	Forestry and Woodlands	FWS, 4, 4-265, Forest and Woodlands; Forest and Woodlands Management Planning: There seems to be a glossing over in this section regarding potential negative impacts from forest and woodland management. There is no discussion of roads, road traffic, fragmentation, noise, stream sedimentation, or disturbance that comes with vegetation management (including logging) activities. In addition, there are many positives touted for aspen restoration and pinyon-juniper removal, but what about the negatives? While many species do utilize and prefer aspen, there are others that do not, and forest and woodland management activities that remove these vegetation types (e.g. lodgepole, spruce-fir, or pinyon-juniper) would be negatively impacted. While it may benefit some, it would not benefit ALL.	BLM did provide a qualitative overview of the kinds of environmental impacts generally associated with timber harvest. BLM does recognize numerous short term impacts associated with these activities including increased soil erosion and sediment loading of streams that may impact water quality. Impacts from roads, timber, skids, and harvest areas are also recognized. Mandatory mitigation included rehabilitation is also identified as necessary to prevent long term adverse impacts. The long term benefits of forest and wood lands management are also recognized as being potentially beneficial for many resources including wildlife, recreation, water quality, etc.
U.S. Fish and Wildlife Service	Lands and Realty	FWS, 2, 2-95, Lands & Realty; Wind Energy Development: We support the statement, "BLM would not permit wind energy development in... migratory bird breeding habitat and raptor nesting complexes," and suggest that you also add: "and areas of high avian use" to account for corridors heavily utilized in bird migration and diurnal movement.	The Wind Energy Development Alternatives A-D contain language regarding breeding areas, however, bird migration corridors and/or areas where birds are highly concentrated would also be protected through mitigation required as a result of site-specific analysis.
U.S. Fish and Wildlife	Livestock Grazing	FWS, 4, 4-294, Livestock Grazing; Opportunities to Eliminate Grazing; Impacts to Special Status Species, and	The impacts of livestock management on wildlife

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Service		Fish & Wildlife: Eliminating grazing would have clear significant benefits for wildlife. The benefits identified in the "No Action Alternative" should be carried across to alternatives C & D (although it is not clear why they are identified in the No Action Alternative at all, given that the No Action is to continue grazing as presently allocated). We commend BLM for the preferred alternative that has been selected for the Green River allotment.	are addressed in Section 4.2.8 of the Proposed RMP/Final EIS.
U.S. Fish and Wildlife Service	Livestock Grazing	FWS, 4, 4-218, Fire & Fuels Management; Impacts to Livestock: No impacts to livestock are anticipated, but what about reseeding and resting from grazing, post-fire? If an area is seeded, it is rested from livestock grazing for some period of time (2 years?) or until desired conditions are met.	The comment is correct that areas are usually rested from grazing following vegetation treatments. However, such resting would be considered an impact if an alternative could not be found to allow that livestock operator to make use of their permit. In most of the fuels projects, either a change in grazing rotation is agreed to, or another pasture is found for the livestock to utilize. On rare occasions a permittee has agreed to non use for the two year period, usually due to having other pastures available to them so as not to hinder their operation. As these instances vary by project, such impacts would be addressed in site-specific NEPA analysis. Based on the decisions and analysis in the Proposed RMP/Final EIS, the impacts based on available information and practice would not be considered substantive.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 2, 2-18, 2.8.5 Minerals & Energy Development, 4th bullet: "Manage oil and gas leases... and in accordance with the Endangered Species Act, as amended." 8th bullet: "...and in accordance with the ESA."	Valid existing leases are subject to the terms and conditions of the standard lease form and laws protecting federally listed species. Section 6 of the Standard Lease Form for Oil and Gas, Form 3100-11 (Appendix 17 of the DEIS) states, “If in the conduct of operations, threatened or endangered species, objects of historic or scientific interest, or substantial unanticipated environmental effects are observed, lessee shall immediately contact lessor. Lessee shall cease any operations that would result in the destruction of such species or objects.” Additionally a stipulation regarding protection of listed species is attached to each lease. Therefore, the addition of ESA language is not needed.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 4, 4-426, Minerals; Coal, Impact Analysis; Impacts to Soil, Water & Riparian: Subsidence can have significant effects to hydrology, including causing dewatering of stream channels and alteration of seeps and spring systems. These need to be identified as significant potential impacts of coal mining. In addition, these impacts would carry over to the Fish & Wildlife and Special Status Species sections.	The Proposed RMP Final EIS recognizes that subsidence impacts from underground mining could potentially cause hydrological shifts, resulting in alterations in water flows. However, subsidence is function of the exact plan for mining which has been and will continue to be addressed at the mining permit stage. Mine plans would be designed

Organization	Category	Comment	Response
			to limit subsidence and mitigate impacts. Over 100 years of coal mining in this region has resulted in only localized impacts on fish and wildlife.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 4, 4-419, Minerals; Assumption, 1st bullet, the first assumption, "valid existing leases would be managed under the stipulations in effect when the leases were issued, and new stipulations proposed under this RMP may not apply.": A proviso regarding federally-listed species should be provided.	Valid existing leases are subject to the terms and conditions of the standard lease form and laws protecting federally listed species. Section 6 of the Standard Lease Form for Oil and Gas, Form 3100-11 (Appendix 17 of the DEIS) states, "If in the conduct of operations, threatened or endangered species, objects of historic or scientific interest, or substantial unanticipated environmental effects are observed, lessee shall immediately contact lessor. Lessee shall cease any operations that would result in the destruction of such species or objects." Additionally a stipulation regarding protection of listed species is attached to each lease. Therefore, the addition of ESA language is not needed.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 4, 4-419, Minerals; Assumptions, 6th bullet: The DEIS assumes that two additional subsurface coal mines (Lila Canyon and North Horn) would be reasonably developed during the next 20 years. The document should include information on all coal leases and other coal-related actions permitted by the BLM.	For analysis purposes, BLM assumes that Lila Canyon and North Horn are the only subsurface coal mines that would reasonably be developed during the next 20 years. Chapter 3 and Appendix 27 of the DEIS include information on coal leases and other coal-related actions permitted by BLM.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 4, 4-433, Minerals; Oil Shale: You should determine if the withdrawal statement is still accurate, and provide information where this lies (including maps). In light of the November 92, 2004 Federal Register Notice from the BLM requesting comments on plans to lease small tracts for oil shale research in three states, we recommend you revise this section. At a minimum, BLM will retain right-of-way permitting authority in these areas, and the document should reflect that.	Please see general comment response #75
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, 4, 4-435, Minerals; Oil, Gas, CBNG, Combined HC Leasing Decisions (also Map 2-31): Increasing the number of acres in Category 1 (Open to Leasing Subject to the Terms & Conditions of the Lease Form) from 0 to 1,183,476 is an enormous change. We recommend that these areas be placed back in Category 2 (Open to Leasing with Minor Constraints), at minimum. This category of leasing will give the PFO much more flexibility and control of leases. We don't understand and disagree strongly with the placement of these areas into a category that provides a minimum of stipulations and oversight. Finally, we recommend that you don't finalize the number of acres in each category until consultation is completed, as some of the figures may need to be adjusted pending consultation.	The suggested management actions for leasing were analyzed under Alternative B and Alternative C in the DEIS, but were not considered for in Alternative D. Less or equally restrictive measures were determined adequate to protect lands and resources in the planning area.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, Appendix 16, 1, To All Surface-Disturbing Activities, and Description of Surface Stipulations: The introductory paragraph indicates this appendix relates to all the surface use stipulations that may be placed on areas. However, the next section implies these stipulations apply to oil and gas. The title and text should clarify the applicability of these stipulations.	Appendixes 8 and 16 of the Draft RMP/EIS have been corrected and combined into Appendix G of the Proposed RMP/Final EIS to remove any inconsistencies.
U.S. Fish and Wildlife	Minerals and Energy	FWS, Appendix 17, 1, Standard Lease Form for Oil & Gas, Form 3100-11: The information in the DEIS is only the	Because Appendix 17 of the Draft RMP/EIS simply

Organization	Category	Comment	Response
Service	Resources	"Terms" section of the standard lease form. You should also include the following from the first page of form 3100-11: Rights granted are subject to applicable laws, the terms, conditions, and attached stipulations of this lease, the Secretary of Interior's regulations and formal orders in effect as of lease issuance, and to regulations and formal orders hereafter promulgated when not inconsistent with lease rights granted or specific provisions of this lease.	repeated the standard lease terms, it has not been carried forward into the Proposed RMP/FEIS. However, the standard lease terms and form 3100-11 apply to all oil and gas leases under all alternatives.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS Appendix 27, Unsuitability for Mining Document; Federal Lands in the Price Management Area; Step 2: Unsuitability Review; Paragraph 3, final sentence: The document states, "Because most of the areas identified as having development potential represent deep coal deposits with no clearly defined areas where surface impacts may occur, the unsuitability criteria will not be applied to the lands where the deposits will be developed only through underground mining." We disagree with the assumption that because you can not clearly define the areas where surface impacts may occur there is no need to apply the unsuitability criteria. Surface impacts from underground mining may be significant, depending on the overlying strata. As we stated previously (Coal, Impacts to Soil, Water and Riparian, page 4-427 and Impacts to Fish and Wildlife, page 4-428), the cumulative effects to surface perennial waters from coal mining subsidence remain undetermined, but may be substantial. Mining subsidence has also been known to collapse cliffs supporting golden eagle nests, and has the potential to collapse cliffs containing Mexican spotted owl nests.	The regulations outlining the procedures for unsuitability determinations provide: “Federal lands with coal deposits that would be mined by underground mining methods shall not be assessed as unsuitable where there would be no surface coal mining operations” (see 43 CFR 3461.1 (a)). Therefore, the unsuitability criteria are applied to coal lands that have the potential to be recovered by surface mining methods.
U.S. Fish and Wildlife Service	Minerals and Energy Resources	FWS, Appendix 27, 6, Unsuitability for Mining Document; Federal Lands in the Price Management Area; Criterion 9: The document should specify which designated critical habitat for federally-listed species overlies areas of the Book Cliffs coal field. If the habitat is for the MSO, the `underground mining exemption' may not apply, for the reason given in the preceding comment.	As explained in the analysis following Criterion 9, the underground mining exemption applies to the Book Cliffs coal field. Therefore, it is not necessary to specifically discuss critical habitats.
U.S. Fish and Wildlife Service	Process and Procedures	This draft environmental impact statement (DEIS) does not provide an adequate analysis of impacts from this Resource Management Plan (RMP) on fish and wildlife resources. While some improvements have been made between the preliminary DEIS and this document, many of our comments from the PDEIS have not been addressed and no changes were made. The attached comments make note at these points.	Please see general comment responses #13, #57 and #58
U.S. Fish and Wildlife Service	Recreation	FWS 4 4-315 Recreation; Common to All Alternatives; Impacts to Special Status Species, and Fish & Wildlife; 3rd paragraph: Allowing rock climbing as close as 300 feet from raptor nest sites would be too close for many species of raptors and could lead to nest abandonment. Adhering to the Raptor Guidelines and the BMPs would call for a 1/4 to 1 mile buffer depending on the species. Recreation activities should not be specially exempted from these protective measures.	The Proposed RMP/Final EIS (Section H of Appendix F) states that Rock climbing activities would be authorized only in areas where there are no conflicts with cliff nesting raptors.
U.S. Fish and Wildlife Service	Soil, Water and Riparian	FWS, 4, 4-30, Soil, Water, & Riparian; Significance Criteria: (Comments remain from PDEIS) 3rd bullet: This statement ("Human activities degrade wetland/riparian areas...") is not clear, and isn't in the form of a significance criterion. Also, is this statement indicating that effects of cattle grazing, trampling damage, etc. are not to be considered when evaluating for significant impacts to riparian areas? These types of impacts definitely do need to be considered. Overall this statement is difficult to understand.	Please see general comment response #72
U.S. Fish and Wildlife Service	Soil, Water and Riparian	FWS 4 4-34 Soil, Water, & Riparian; Protection of Water Quality in Natural Springs; Impacts to Soil, Water & Riparian: Alternative C ("BLM would discourage development of spring sources") would also have many positive impacts on Soil, Water, and Riparian resources, including but not limited to maintaining flows for the aquatic environment and for sustaining riparian vegetation. Conversely, Alternative D ("BLM would allow development of spring sources...") would NOT have "No significant impact." The development of springs, even with protection of the spring source, would have numerous direct and indirect effects to fish and wildlife.	Please see general comment response #72
U.S. Fish and Wildlife	Soil, Water and Riparian	FWS 4 4-420 Minerals; Impact Analysis; Impacts to Soil, Water, & Riparian: Impacts to water quality should be	Please see general comment response #72

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Service		identified, particularly relative to potential coalbed methane development.	
U.S. Fish and Wildlife Service	Soil, Water and Riparian	FWS 4 4-427 Coal; Impacts to Soil, Water & Riparian: We disagree with the determination of impacts. Mining subsidence has been shown to have detrimental effects to existing streams and their associated riparian areas and wetlands. Perennial water sources, such as springs, can be completely lost, and subsidence can eliminate entire reaches of perennial streams. The loss or relocation of perennial surface water may affect terrestrial species that lack mobility. Such species include mollusks, amphibians, and floral species that are either riparian or seep-obligate.	Please see general comment response #72. Subsidence is function of the exact plan for mining which has been and will continue to be addressed at the mining permit stage. Mine plans would be designed to limit subsidence and mitigate impacts. Over 100 years of coal mining in this region has resulted in only localized impacts on fish and wildlife.
U.S. Fish and Wildlife Service	Soil, Water and Riparian	FWS 4 4-428 Coal; Impacts to Fish & Wildlife: We disagree with the determination of impacts. Mining subsidence has been shown to have detrimental effects to existing streams and their associated riparian areas and wetlands. Perennial water sources, such as springs, can be completely lost, and subsidence can eliminate entire reaches of perennial streams. The loss or relocation of perennial surface water may affect terrestrial species that lack mobility. Such species include mollusks, amphibians, and floral species that are either riparian or seep-obligate.	Please see general comment response #72. Subsidence is function of the exact plan for mining which has been and will continue to be addressed at the mining permit stage. Mine plans would be designed to limit subsidence and mitigate impacts. Over 100 years of coal mining in this region has resulted in only localized impacts on fish and wildlife.
U.S. Fish and Wildlife Service	Soil, Water and Riparian	FWS, Appendix 8, 2, Riparian-Wetland and Fisheries: The streams types listed should include "ephemeral," in addition to perennial and intermittent.	Please see general comment response #72
U.S. Fish and Wildlife Service	Special Status Species	Finally, the special status species sections of both chapters 3 and 4 are particularly limited. We note that the biological assessment for section 7 consultation is not a substitute for a thorough description and analysis for special status species in this NEPA document. We recommend that you include, as an appendix, the final biological assessment and the FWS consultation history and biological opinion for this RMP. In addition, because the DEIS provides inadequate information and discussion regarding threatened and endangered species, we recommend that you defer the final decision on such things as lease stipulations and acres per lease category pending completion of section 7 consultation, as consultation may potentially change the final acreages and stipulations.	Please see general comment response #62
U.S. Fish and Wildlife Service	Special Status Species	FWS 3 3-24 3.2.7, Special Status Species: 2nd paragraph, 3rd sentence: Change to "Formal consultation... is required..."	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 3 3-24 3.2.7.1 Special Status Plants: (Comments remain from PDEIS) More information is needed to complete an appropriate description of the affected environment. Simply listing the plant species in the PFO is not sufficient to allow a thorough analysis of effects. This section should be expanded to include a description of each species; its status; rangewide distribution; known occurrences and distribution in the PFO; habitat requirements; and reasons for current status and ongoing threats. Identify available Recover Plans, Conservation Agreements/Strategies, Executive Orders (i.e., E.O. 13186 for Migratory Birds) that provide species-specific management direction.	Please see general comment response #62
U.S. Fish and Wildlife Service	Special Status Species	FWS, 3, 3-25, 3.2.7.2, Special Status Fish & Wildlife: This 1st paragraph needs better organization. It is disjointed and unclear. The correct map reference for designated critical habitat is Map 3-7.	The language of the Draft RMP/EIS has been edited for the Proposed Plan/Final EIS. Map 3-6 of the Proposed RMP/Final EIS shows Designated Critical Habitats for Threatened and Endangered species.

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U.S. Fish and Wildlife Service	Special Status Species	FWS 3 3-25 Table 3-12;Federally Listed Plant Species in the PFO: Colorado River cutthroat trout (Oncorhynchus clarki pleuriticus) should be added to Table 3-11 and a complete species and habitat description; status; rangewide distribution; known occurrences and distribution in the PFO; and reasons for current status and ongoing threats.	Please see general comment response #62
U.S. Fish and Wildlife Service	Special Status Species	FWS, 3, 3-25, 3.2.7.2 Special Status Fish & Wildlife: (Comments remain from PDEIS) More information is needed to complete an appropriate description of the affected environment. Simply listing the sensitive fish and wildlife species in the PFO is not sufficient to allow a thorough analysis of effects. This section should be expanded to include a description of each species; its status; rangewide distribution; known occurrences and distribution in the PFO; habitat requirements; habitat use in the PFO (i.e. nesting, foraging, wintering) and reasons for current status and ongoing threats. Designated critical habitat for listed species should also be identified, and include a description of primary constituent elements. Describe available Recovery Plans, Conservation Agreements/Strategies, Executive Orders (i.e., E.O. 13186; Responsibilities of Federal Agencies to Protect Migratory Birds) that provide species-specific management direction.	Please see general comment response #62
U.S. Fish and Wildlife Service	Special Status Species	FWS 3 3-26 3.2.7.2 Raptors: The section on raptors shouldn't be under Special Status Species, with the exception of discussion on special status raptors such as MSO, eagles, BCC raptors, and State sensitive raptors. Otherwise, this belongs under Fish & Wildlife. In addition, our PDEIS comments were unaddressed: Species-specific habitat descriptions should be provided; it is too general to state "...considerable habitat of value... includes... rimnrock canyons... other areas.... are the Book Cliffs... and Desolation and Gray Canyons."	Please see general comment response #62
U.S. Fish and Wildlife Service	Special Status Species	FWS, 3, 3-26, 3.2.7.2 Raptors; 2nd paragraph: The discussion on special status fish should not be in a Raptor section.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-66 Vegetation; Vegetation Treatments; Impacts to Special Status Species: Alternative D states that "Management actions for vegetation treatments would only occur through natural processes..." Is this saying that there would be NO mechanical treatment or use of prescribed fire for vegetation management? That does not follow with the Vegetation Decisions (page 4-55). In addition, Alternative A seems to provide a more detailed impact analysis - why is Alt. D not as thorough? Inconsistent.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-150 Special Status Species; Significance Criteria: 3rd bullet: A significance impact to a listed species would fall well before "take" occurs. While this is not an untrue statement ("Actions leading to or resulting in "take"... would require consultation with USFWS"), it would be better phrased as: "Actions that may adversely affect federally listed species would be considered significant and would require consultation with USFWS." Otherwise it implies that it's not a significant impact unless actual take occurs.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-150, Special Status Species; Significance Criteria: 4th bullet: Any action that, by itself, would lead to federal listing under ESA would surely be beyond "significant." "Significant impact" falls well before this point. This bullet is actually covered under bullet #5, with the exception of the phrase "may be considered significant" in bullet 5. Combining bullets 4 and 5 would be an improvement: "Actions that reduce the population size, contribute to a downward trend, or reduce the habitat suitability would be considered significant."	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-150 Special Status Species; Significance Criteria: Add the italicized to the 1St bulleted statement: "Any surface disturbance and/or human activity within potential or occupied habitat or that may affect such habitat, including designated critical habitat, for a federally listed species..." Such activities that occur adjacent to potential or occupied habitat could also affect wildlife or fish (e.g. via a change in hydrology).	The language included in the Special Status Species Impacts section of the Proposed RMP/Final EIS (section 4.2.7) does not include the significance criteria. An analysis assumption has

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			been included that indicates that the U.S. Fish and Wildlife Service would be consulted on any actions with the potential to affect federally listed species or designated critical habitat.
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-130, Special Status Species; Methods of Analysis: The recovery plans are not listed below, as stated. This should reference Table 1-3, or list them again here.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-154, Special Status Species; Impacts to Minerals and Energy: This comment is a repeat from our March PDEIS comments. The document states that the Impacts to Minerals and Energy Development from Special Status Species are thus: "No surface disturbance would be permitted within known populations or potential habitats of special status plants or animals...without consultation or conference between BLM and USFWS... (which) would increase costs to the operator and potentially result in... relocating facilities and/or delay activities." If you want to make this claim you'd better be prepared to back it up with documentation. If section 7 consultation and other coordination on wildlife issues (such as the need for surveys) occur early in the process (one component of streamlining) any potential delays would be minimized or eliminated. Rather than continue to foster a myth that is not based in fact (and in keeping with administration efforts to promote early coordination), we recommend you incorporate language similar to that in the section on Impacts to Minerals from Cultural Resources, page 4-110. We recommend, "initiation of required section 7.consultation or wildlife resource surveys in a timely fashion prior to initiating surface disturbing activities would minimize the potential for costly delays in mineral development activities."	Even though the early consultation would "minimize" the potential for costly delays, costly delays in mineral development activities could still occur.
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-155, Fish & Wildlife; Significance Criteria: 5th bullet, change text to: Perennial, intermittent, or ephemeral streams or channels.	The suggested change in wording is not applicable because the significance criteria have been eliminated in the Proposed RMP/Final EIS. Impacts of alteration of perennial, intermittent, or ephemeral streams or channels on fish and wildlife are analyzed.
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-277, Livestock Grazing; Common to All Alternatives; Impacts to Special Status Species: (Comment form PDEIS) There is insufficient identification and analysis of impacts to conclude that "Livestock grazing is not anticipated to impact federally listed....species" What is this based on? It is certainly contradictory to the preceding sentence, "Livestock grazing alters vegetation structure and composition."	The Proposed RMP/Final EIS includes a more detailed analysis of impacts on special status species and other wildlife from livestock grazing. See Section 4.2.7 of the Proposed RMP/Final EIS.
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-390, Lands & Realty; Disposal of Lands; Decisions: 3rd bullet: Very few habitats for sensitive species have been identified in the RMP, leading to concerns that this statement will be useless for protecting against exchange of lands that contain sensitive species habitat. The only "sensitive species habitat" identified in the RMP is Critical Habitat for Mexican spotted owl and the CO River fish. We recommend that this 3rd bulleted statement be changed to: "The land is not more suitable for other resource management and development such as wilderness ... and sensitive species habitats as identified by a BLM wildlife biologist and in coordination with the USFWS."	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-403, Lands & Realty; Transportation and Utility ROW Corridors; Alternative D: "Construction of (power lines and wind turbines) in raptor concentration areas and migration routes would result in increased mortality to these species" (emphasis added). We recommend this statement be broadened to "major bird migration corridors or in areas where birds are highly concentrated." Migratory birds in general (not only raptors) experience high mortality from wind turbines. We also recommend BLM commit to use of raptor-safe	Please see general comment response #60

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		power pole construction when new poles are being erected, and retrofitting poles where raptor electrocution problems are identified.	
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-421 Minerals; Impact Analysis; Impacts to Special Status Species and Fish & Wildlife (throughout section): (Comment made in PDEIS also) There is no analysis supporting the determination of no significant impacts to Special Status Species. At a minimum, the following impacts should be analyzed: impacts to listed plant species from surface-disturbance associated with locatable minerals; impacts to endangered fish, plants, and bald eagle from loss of perennial surface water due to mining subsidence; impacts to endangered fish and critical habitat from changes in water quality, quantity, and hydrograph due to mineral activities; potential for vehicular mortality to bald and golden eagles and other raptors from minerals activities; loss of cliff habitat for golden eagles and MSO; migratory bird mortality, habitat loss, and habitat fragmentation.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-427 Minerals; Coal, Impacts to Special Status Species: There is no analysis supporting the determination of no significant impacts to Special Status Species.	Please see general comment response #106
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4-431 Minerals; Conflicts in Areas with oil, gas, or CBNG; Impacts to SSS and Fish & Wildlife: There is no analysis supporting the determination of no significant impacts to Special Status Species or Fish and Wildlife.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS 4 4442, Minerals; Oil, Gas, CBNG, Combined HC Leasing; Impacts to Special Status Species: There is no analysis supporting the determination of no significant impacts to Special Status Species.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS, 4, 4-463, Minerals; Locatable Minerals; Impacts to Special Status Species: There is no analysis supporting the determination of no significant impacts to Special Status Species.	Please see general comment response #58
U.S. Fish and Wildlife Service	Special Status Species	FWS, Appendix 4, all, PFO Listed, Sensitive, Other Native Species: Please add Colorado River cutthroat trout (Oncorhynchus clarki pleuriticus) to the list of Sensitive/Native Species as a State sensitive species.	Appendix 4 has not been reproduced in the Proposed RMP/Final EIS. However, the presence of Colorado River cutthroat trout in several Emery County rivers and streams is noted in section 3.2.7 of the Proposed RMP/Final EIS.
U.S. Fish and Wildlife Service	Vegetation	FWS, 3, 3-15, 3.2.3.1 Sagebrush: (Comments remain from PDEIS) Section should identify acreage and location of the recent sagebrush die-off in the PFO; the extent and effects to wildlife of this die-off may be substantial, particularly in light of other ongoing and future proposed human activities.	Site-specific data on sagebrush die-off from the Southeast Region of UDWR has been incorporated into Section 3.2.3 of the Proposed RMP/Final EIS. The PFO plays an active role with Utah Partners for Conservation and Development (UPCD) and is currently working on a large sagebrush-steppe restoration project on the benches west and north of Price. Also see general comment response #162.
U.S. Fish and Wildlife Service	Vegetation	FWS, 4, 4-421, Minerals; Impact Analysis; Impacts to Vegetation Resources: The impacts identified here are only positive ones that result from the withdrawal of areas from mineral development. What about the impacts to vegetation that will result from development? There is much here that is being left out.	The impacts to vegetation correspond to the Common To All actions for minerals, which discusses withdrawals, mitigation strategies, and other standard operating procedures. Impacts associated with development are discussed on subsequent pages and address impacts to vegetation from mineral development, wells, and associated infrastructure.

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U.S. Fish and Wildlife Service	Vegetation	FWS 4 4-437 Minerals; Oil, Gas, CBNG, Combined HC Leasing; Impacts to Vegetation Resources: You should explain why the first portion of the vegetation impact analysis is specific to CBNG. Basing the net disturbed area on achieving reclamation within 3 years is optimistic, at best. Most of the Price FO management area is an arid or drought-prone system, and the reclamation period should reflect that. A better estimate would be 5-10 years, depending on the system. Even that may not mean that lost wildlife habitat will be restored.	In the Proposed RMP/Final EIS the analysis of impacts on vegetation from oil and gas activities is based on disturbance associated with drilling of oil and gas wells and is not specific to oil, gas, or CBNG. The reclamation timeframe has been changed to "short-term" instead of specified years to identify that regardless of years, adequate restoration should be achieved in a short timeframe but may vary depending on the habitat (i.e., arid areas take longer to recover than areas with moisture).
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 1, 1-9, 1.6.5 Fish & Wildlife; 1St bullet: The first item states that the RMP will "Define desired future conditions." Where is this done? FWS, 1, 1-9, 1.6.5 Fish & Wildlife: 1St bullet: Change "Designate priority species and critical habitats (special status species)" to "Identify priority species and critical habitats..." The BLM does not designate critical habitat, in the legal sense. FWS, 1, 1-13, 1.7 Table 1-3: In addition, the Colorado River Cutthroat Trout is managed under a Conservation Agreement and Strategy, a statewide cooperative agreement between resource agencies, including BLM, UDWR, the Forest Service, and the FWS. FWS, 1, 1-13, 1.7 Table 1-3: The peregrine falcon is no longer managed under its recovery plan, as it was delisted in 1999. The reference to its 1984 recovery plan should be removed from this list.	The Proposed RMP/Final EIS has been changed as suggested in the comment.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS. 1, 1-17, 1.10 Collaborative Management: Should reference Executive Order 13352, August 26, 2004, pertaining to Facilitation of Cooperative Conservation. The BLM should also make a commitment to cooperate and collaborate with other federal agencies, e.g., FS, EPA, NRCS, USGS, BIA, and USFWS.	Please see general comment response #46
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 1, 1-18, 1.11 Plan, Monitoring, Maintenance, Amendment, Revision, and Implementation: We could find no discussion of a commitment to monitor resources to determine impacts from the plan management decisions. Regarding fish and wildlife resources, we recommend a commitment to work cooperatively with UDWR and USFWS to determine, develop, and implement necessary monitoring plans.	Please see general comment response #159
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 2, 2-12, 2.7.8 Fish & Wildlife; 12th (last) bullet: The document states: "Maintain, protect, and restore riparian and wetland areas to a proper functioning-condition state (within capability)..." Does this mean within the capability of the natural system, or within capability of the PFO? Please clarify.	Please see general comment response #8. The statement on capability refers to the natural ability of the system.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 2, 2-33, 2.16 Alternatives Summary Table; Off-Site Mitigation for Habitat Loss: This version has even fewer mitigation requirements than the preliminary DEIS. What was a requirement for a 1:1 mitigation ratio is now "BLM would encourage partners to participate in offsite mitigation" (emphasis added). This indicates an entirely voluntary action on the part of applicants; we do not believe this is sufficient to provide adequate protection for the resources. Furthermore, while the PDEIS provided a range of alternatives (we commented that we preferred Alternative B, which required 1:1 mitigation for impacts to both crucial and high-value habitat), the range has been eliminated in the DEIS. All alternatives are the same.	Please see general comment response #43

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		Finally, our comments from the PDEIS still remain: Even a 1:1 ratio may not be sufficient to compensate for impacts in some situations. Depending on the surface disturbance, indirect and cumulative impacts, and the quality of the habitat lost, this mitigation could underestimate the actual amount needed in order to protect and conserve important wildlife habitat. We recommend that the wording in the PDEIS be reinstated, and changed to "Require a minimum of 1:1 acre-for acre..." to allow for flexibility to increase mitigation requirement in cases where the PFO deems it necessary.	
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 2, 2-39, 2.16 Alternatives Summary Table; Fish & Wildlife; Goals and Actions Common to All: The third and fourth goals ("Recognize and support...") are virtually identical to the first two Actions Common to All. Are these statements Goals or Actions?	The goals and actions section has been rewritten to clarify the differences between goals and actions.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 2, 2-43, 2.16 Alt. Summary Table; Fish & Wildlife; Wildlife Habitat Areas: All the alternatives state: "Dates of seasonal closures... would be revised..." - revised from what? Or to what? Unclear.	The Summary table now includes a reference to Appendix G. Appendix G explains how the seasonal closures would be revised.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS 2 2-43 2.16 Alt. Summary Table; Fish & Wildlife; Management of Migratory Bird Habitats: Please delete "Efforts to comply with." If you can say, "Manage according to ... EO 11988 and 11990" for wetlands, you can say "Management according to EO 13186...would be integrated into programs..."	No change has been made because BLM does not have the discretion to not comply with the EO.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 3, 3-13, 3.2.3.1 Vegetation Cover Types: Each cover types described in this section has Birds of Conservation Concern and species on the Partners in Flight priority list associated with it. These should be identified as follows: Mixed conifer: broad-tailed hummingbird, flammulated owl, red-naped sapsucker, Williamson's sapsucker Aspen: broad-tailed hummingbird, pygmy nuthatch, Swainson's hawk, red-naped sapsucker, Williamson's sapsucker Ponderosa pine: broad-tailed hummingbird, flammulated owl, Lewis's woodpecker, pygmy nuthatch, pinyon jay, Oak: gray vireo, Virginia's warbler Mountain shrub: Virginia's warbler P-J woodlands: black-throated gray warbler, ferruginous hawk, gray vireo, pinyon jay, Virginia's warbler, loggerhead shrike Sagebrush: sage sparrow, Brewer's sparrow, ferruginous hawk Grasslands: ferruginous hawk, Northern harrier Desert shrub: Brewer's sparrow, loggerhead shrike, Bendire's thrasher, Northern harrier, prairie falcon Riparian: broad-tailed hummingbird, red-naped sapsucker	The suggested changes have not been made because the Vegetation Cover section of Chapter 3 focuses on the vegetation cover with only a general description of associated wildlife. The vegetation cover requirements for the birds identified in the comment change by season and are listed in Table 3-18, Migratory and Non-Migratory Bird Species.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 3, 3-26, 3.2.8 Fish & Wildlife: This section needs much more discussion on the status, distribution, habitat requirements, and known threats to other non-game wildlife that is present in the PFO. Similar to the descriptions provided for bighorn, mule deer, elk, and pronghorn, Chapter 3 needs far more on non-game mammals, migratory birds (see above), raptors (good start, but needs more). We suggest more information on the status, distribution, etc. of sage grouse and white-tailed prairie dog as well.	Impact on all non-game species is not an issue. The Chapter 3 discussion of sensitive species includes information on those non-game species that are of interest, including sage grouse and white-tailed prairie dogs.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-36, Soil, Water, & Riparian; Protection of Water Quality in Natural Springs; Impacts to Fish & Wildlife: Alternative C should be changed to: "...discouraging the development of springs would potentially increase the ability to wildlife to fully use these crucial water sources..."	The suggested changes have not been made because the original analysis is correct. Developed springs tend to be more reliable during dry periods and times of drought.

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U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-68, Vegetation; Vegetation Treatments; Impacts to Fish & Wildlife: The analysis of impacts in this section omits virtually any mention of possible negative effects to fish and wildlife. While there can be many positive effects from vegetation treatments, there are accompanying negative impacts. What benefits one species, may negatively impact another. This section deserves a much more thorough analysis that looks at both positive AND negative impacts.	Short-term impacts on wildlife from vegetation treatments are now included in the analysis.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-88, Vegetation; Mitigation for Habitat Loss; Decisions: Same as comment for page 2-33 (2.16 Alternatives Summary Table, Offsite Mitigation for Habitat Loss): This version has even fewer mitigation requirements than the preliminary DEIS. What was a requirement for a 1:1 mitigation ratio is now "BLM would encourage partners to participate in offsite mitigation" (emphasis added). This indicates an entirely voluntary action on the part of applicants; we do not believe this is sufficient to provide adequate protection for the resources. Furthermore, while the PDEIS provided a range of alternatives (we commented that we preferred Alternative B, which required 1:1 mitigation for impacts to both crucial and high-value habitat), the range has been eliminated in the DEIS. All alternatives are the same. Finally, our comments from the PDEIS still remain: Even a 1:1 ratio may not be sufficient to compensate for impacts in some situations. Depending on the surface disturbance, indirect and cumulative impacts, and the quality of the habitat lost, this mitigation could underestimate the actual amount needed in order to protect and conserve important wildlife habitat. We recommend that the wording in the PDEIS be reinstated, and changed to "Require a minimum of 1:1 acre-for acre..." to allow for flexibility to increase mitigation requirement in cases where the PFO deems it necessary.	Please see general comment response #43
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-155, Fish & Wildlife; Significance Criteria: A criterion should be added relating to migratory bird habitat impacts, e.g. a human-caused surface disturbance would be considered significant if it impacts migratory bird nesting or foraging habitat.	Significance criteria have not been included in the Final Proposed RMP/EIS. The context and intensity of impacts have been provided to describe the significance of impacts.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-155, Fish & Wildlife; Significance Criteria: A criterion should be added relating to white-tailed prairie dog habitat, e.g. a human-caused surface disturbance would be considered significant if it impacts occupied white-tailed prairie dog habitat.	Significance criteria have not been included in the Final Proposed RMP/EIS. The context and intensity of impacts have been provided to describe the significance of impacts.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS 4 4-162 Fish & Wildlife; Predator Control; Impacts to F&W: How can there be no impacts to fish and wildlife, when, by its nature, controlling predators means killing or removing some form of wildlife (coyotes, or other)? In addition, there can be indirect effects; for example, excessive predator control (e.g. coyotes) could result in increased populations of red fox with devastating effects to local sage grouse population. If predator control is implemented on a very limited scale, then perhaps there are no significant impacts, but it does, at least, merit some explanation here.	Please see general comment responses #47 and #159
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-164, Fish & Wildlife; Identify Actions and Areawide Use Restrictions to Achieve Desired Fish & Wildlife; Population and Habitat Conditions: This is an incredibly broad, wide-ranging action item, and has great possibilities. The activities and areawide use restrictions that could be implemented (and ARE being implemented) to benefit F&W populations and habitat are numerous - FAR more numerous than simply managing livestock grazing. Recreation, Minerals, and Forest/Woodland Management ALL have numerous possible means to benefit fish and wildlife. The fact that only one resource management, grazing, was identified, and by design to improve big game winter range (how about non-game wildlife, including fish, other mammals, birds??), is	The heading referred to in the comment has been removed in Chapter 4. Actions and Use Restrictions are identified for each resource and use in the Proposed RMP/Final EIS.

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		startling. A nice idea for an action item, but why so limited in how it is proposed to be carried out?	
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4493, Fish & Wildlife; Management of Migratory Bird Habitats; Decisions: Please delete "Efforts to comply with." If you can say, "Manage according to ... EO 11988 and 11990" for wetlands, you can say "Management according to EO 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, would be integrated into programs..."	No change has been made because BLM does not have the discretion to not comply with the EO.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, 4, 4-278, Livestock Grazing; Common to All Alternatives; Impacts to Fish & Wildlife: Birds section - Many birds are, in fact, negatively impacted by livestock grazing. See sensitive species section on page 4-277: "Grazing alters vegetation." Cowbirds have a predatory relationship with other species of birds. See page 4-303 to 304 for good cowbird text to put here as well.	The analysis included in the Proposed RMP/Final EIS addresses impacts to birds in general.
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS Appendix 7 all Raptor BMPs: This is not the most up-to-date version of the document. We will reserve the right to make comments until further revisions are made; however, we recommend you use the latest version.	Please see general comment response #59
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS Appendix 8, 2 Spatial and Seasonal Wildlife Conservation Measures, Raptor: Surface Use Restriction for Raptor Cliff Nesting Complexes and other Known Nest Sites (first 2 rows of table on p.2): To correspond with the Utah Raptor Guidelines and PFO Best Management Practices for Raptors, the buffer would apply for any nests occupied in the last seven years (not three). In addition, the buffer distance does not always have to be 1/2 mile; in some instances it should be greater, in some less. In short, it depends on the raptor, and the site-specific situation.	Please see general comment response #59
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, Appendix 8, 2, Spatial and Seasonal Wildlife Conservation Measures, Sage Grouse: Surface Use Restriction for sage grouse leks: The No Surface Occupancy restriction should also include a buffer around each lek (e.g. 0.6 mile buffer for human disturbance during breeding season; 2.0 mile buffer for permanent facilities; 1300 foot buffer for roads, fences, poles, and utility lines).	Please see general comment response #55
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, Appendix 16, 1, Exceptions, Modifications and Waivers: The discussion regarding Exceptions, Modification, and Waivers (last paragraph Appendix 16) states, "surface stipulations could be excepted, modified, or waived by the authorizing officer." Regarding T&E species, the BLM should add the phrase, "after section 7 consultation under ESA with the USFWS."	Please see general comment response #41
U.S. Fish and Wildlife Service	Wildlife and Fish	FWS, Appendix 16, all, Description of Surface Stipulations: The list of stipulations is distinguished by the complete lack of stipulations conserving or protecting threatened, endangered, or candidate species and their habitat. For example, Price manages one of the Mexican spotted owl designated critical habitat units. It is highly important that the BLM to work closely with the FWS to develop suitable stipulations for this and other listed or candidate species. Any parcel that has been identified as containing or affecting threatened or endangered species or habitat should include, but not be limited to, the Washington Office Instruction Memorandum #2002-174 stipulation, which was developed by BLM and FWS at the Washington level. FWS is currently working with the BLM Utah State Office to develop minimization measures that will be incorporated into species-specific lease notifications. Once these measures have been developed, BLM should supplement the WOIM #2002-174 stipulation with the specific notifications developed through the joint endeavor of BLM and FWS.	Please see general comment response #7
Uintah County	Socioeconomics	A review of the draft raises several concerns. Mineral development in the area not only drives local economies and tax base but contributes greatly to Utah State tax revenues. It is Uintah County's position that these impacts were either poorly addressed in the draft or were not addressed at all. These include, but are not limited to, the	The RFD has been adjusted to reflect more accurately the future anticipated development. The Chapter 4 economic analysis will also be adjusted

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		failure to properly identify mineral potential. The failure to properly develop realistic projections of reasonable foreseeable development and the failure to adequately analyze the impacts of the proposed actions on local job markets, local economies, and tax bases. The draft also fails to comply with the direction and spirit of EPCA.	to reflect this information. Appendix 23 of the Draft RMP/EIS contained information concerning EPCA considerations in the planning process.
UT/AZ ATV Club	Alternative Maps	The BLM indicates many miles of road and trails will be open for OHV use via the Preferred Alternative OHV Designation Map? This type of deception will not be tolerated. The BLM must update to accurately portray the OHV designations outlined in each alternative.	Please see general comment response #31
UT/AZ ATV Club	OHV Route Identification	The BLM must disclose all changes that each alternative may make in the San Rafael Route Designation Plan... the Chimney Rock/Summerville trail system will be designated open. Why is this not on the Preferred Alternative OHV Route Designation Map? This type of deception will not be tolerated. The BLM must update to accurately portray the OHV designations outlined in each alternative... We would like links to the Arapeen Trail System. All of the Chimney Rock/Summerville and Humbug trail systems should be left open. All existing roads and trails should be left open to vehicle use.	See general comment responses #19 and #20.
UT/AZ ATV Club	OHV Route Identification	There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands... The BLM has proposed many overlapping management 'layers' in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, are not drawn along any recognizable geographic boundary making compliance virtually impossible. We oppose all management 'layers' outlined in the draft plan.	Please see general comment responses #19 and #81
Utah Back Country Pilots Association	Transportation and Access	The Utah Back Country Pilots Association respectfully suggest the following changes to the DEIS. Please include these in your list of existing and currently used back country airstrips:(1) Horseshoe Canyon (2) Gruvers Mesa (3) Stone Cabin-Gas Field (4) Temple Wash. An inventory of all airstrips within the RMP Area follows as an Addendum. Please include some mention of recreational flying as a recognized "casual use" of public lands within the Price RMP area. This is very important to us for several reasons: (1) It fairly recognizes that recreational flyers are equal to other "casual users" of public lands, like horsemen, offers and hikers. (2) It gives flyers their own limited set of 'trailheads' from which to recreate.(3) It allows the continued use of other existing backcountry airstrips, without having to mention each and every one in the Support section Chapter 2.10.1.(4) It allows recreational flying to be differentiated from surface vehicles, with respect to possible future motorized access closures due to impacts, to which aircraft did not contribute.	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	"Continue to use, as a "casual use" the existing backcountry airstrips for noncommercial and limited commercial use Four examples are; Peter's Point, Mexican Mountain, Cedar Mountain, Hidden Splendor. Extended commercial use would require a ROW. Any closure of an existing airstrip would be done through consultation with the Federal Aviation Administration, the Utah Division of Aeronautics, The Counties, local communities, ROW holders, and other permitees on a case-by-case basis"...Backcountry recreational aviators ask only for continued access to a small number of airstrips for a place to stop and enjoy our own 'trailheads'.	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	The Utah Back Country Pilots would like to thank the staff at the Price Field Office for including four backcountry airstrips into the RMP Draft Environmental Impact Statement under Chapter 2.10.1. .Cedar Mountain, Hidden Splendor, Mexican Mountain and Peter's Point are important inclusions for any land use plan, as these airstrips are valuable for many reasons. They have community value in that they contribute to the local economy by advancing mineral exploration and tourism, they provide large flat areas to stage fire fighting equipment and conduct med-evacs, they provide known emergency landing spots to cross country general aviation, and are viewed as "airstrip trailheads" by recreational flyers.	Please see general comment response #21
Utah Back Country Pilots	Transportation and	The Utah Back Country Pilots Association respectfully suggests the following changes to the DEIS: Please	Please see general comment response #21

Organization	Category	Comment	Response
Association	Access	include these in your list of existing and currently used backcountry airstrips: 1) Horseshoe Canyon 2) Gruvers Mesa 3) Stone Cabin Gas Field 4) Temple Wash An inventory of all airstrips within the RMP Area follows as an Addendum	
Utah Back Country Pilots Association	Transportation and Access	Please include some mention of recreational flying as a recognized “casual use” of public lands within the Price RMP area. This is very important to us for several reasons: 1) It fairly recognizes that recreational flyers are equal to other “casual users” of public lands, like horseman, rafters, and hikers. 2) It gives flyers their own limited set of ‘trailheads’ from which to recreate.) It allows the continued use of other existing backcountry airstrips, without having to mention each and every one in the Support section Chapter 2.10.1.) It allows recreational flying to be differentiated from surface vehicles, with respect to possible future motorized access closures due to impacts, to which aircraft did not contribute.	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	Some suggested ideas for rewording of Chapter 2.10.1 follows: Continue to use, as a “casual use”, the existing backcountry airstrips for noncommercial and limited commercial use Four examples are: – Peter’s Point – Mexican Mountain – Cedar Mountain – Hidden Splendor Extended commercial use would require a ROW. Any closure of an existing airstrip would be done through consultation with the Federal Aviation Administration, the Utah Division of Aeronautics, The Counties, local communities, ROW holders, and other permitees on a case-by-case basis.”	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	Discussion of Issues Surrounding Backcountry Landing Strips: ounting strips, both public and private on other than BLM administered lands, there are over twenty aircraft landing strips within the Price RMP Area. The Price RMP Area already lies beneath several General Aviation travel corridors or routes. Two examples of these would be the route from Denver to Las Vegas and Salt Lake City to Albuquerque. Air traffic over the RMP area will continue to be a reality. Backcountry recreational aviators ask only for continued access to a small number of airstrips for a place to stop and enjoy our own ‘trailheads’. The common factors that all of these airstrips share are that they are already existing features upon the land, and they have existed and been used for decades with no impact on the eco-systems that they occupy. In many cases, the impact is so small that many land managers are unaware of their current use, and they require almost no resources to maintain. Take the case of Peter’s Point. It would have been expensive to recreate this facility had it been previously remediated. It is again a valued part of the economic infrastructure of the RMP area and Carbon County, at very little cost to the public. Do we know the future value of these other facilities? As the original industrial uses faded, these airports were discovered by recreational flyers between 25 and 50	Please see general comment response #21

Organization	Category	Comment	Response
		years ago. Over the years, simple visitation patterns have chosen which airports remained of value to the aviation community. The number of remaining airports to which a recreational "premium" has been attached has dwindled to less than a dozen on BLM managed lands in the Price RMP Area. These continue to be visited by aviation recreationists and are maintained by consistent use and the occasional application of a shovel. The rest are somewhere in the long process of being reclaimed by nature. As a vehicle for visiting public lands, the airplane uses only a small strip of land, typically about the width of a dirt road and less than a half mile in length. Counting a small parking area, this totals less than 3 acres each. Since aircraft are not mechanized vehicles in the traditional sense, they are incapable of spinning their wheels, churning up soil, and there is not a problem of airplanes "leaving the trail". Unlike vehicular trails, the airstrips will maintain their vegetative cover. The land disturbances were created at the time these airstrips were first established, and no new disturbances will be needed for the continued use of these small acreages. Visitors arriving by small airplane normally explore on foot after landing, and should be considered as hikers and campers accessing public land.	
Utah Back Country Pilots Association	Transportation and Access	BLM should be fair to Aviators. The BLM publishes the following facts and figures about their generous treatment of other user groups; "The (BLM) public lands offer a wide range of recreational opportunities: more than 200,000 miles of fishable streams, 2.2 million acres of lakes and reservoirs, 6,600 miles of floatable rivers, more than 500 boating access points, and almost 70 National Back Country Byways". While other legitimate user groups like rafters, or RV enthusiasts, enjoy millions of dollars of improvements throughout the West, backcountry pilots have asked for none. Indeed, too many improvements to these airports would spoil their rustic and remote character which is a major attraction for flyers. These few landing sites in the Price RMP area, and pilots as a user group, should be viewed in perspective to their actual impact.	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	Liability is one of the most prevalent concerns of land managers when considering airplane access. UBCP believes that there has never been any credible liability problem for the BLM arising from aviation. All fifty states now have some sort of recreational use statute to protect public and private land holders from liability, if they in turn, will make their lands open for recreation at no charge to the public. The Utah Back Country Pilots would like a formal written answer to the following question; "Can the BLM provide any evidence that they have ever had a legal action brought against them for 'liability' for any aircraft accident upon a landing strip on BLM administered lands?	Liability issues are beyond the scope of the RMP.
Utah Back Country Pilots Association	Transportation and Access	Frequency and Time of use: The number of aircraft using the airstrips in the RMP area would be limited by the season and weather. Summertime heat would limit use. The fall would probably see the most aircraft use due to the prevailing cooler temperatures. Frequent windy days in the spring would tend to reduce flying activity. During periods of precipitation, there would be no aircraft arrivals and departures. Thus, user conflicts would be even more limited.	Please see general comment response #21
Utah Back Country Pilots Association	Transportation and Access	1) Secretary of the Interior supports the retention of backcountry airstrips. 2) The airstrips in the Price RMP area are compatible with the BLM policies of multiple use and dispersed recreation. 3) The airstrips in the RMP area are already existing features and provide a public benefit for a variety of uses. 4) Backcountry aviation is low impact and the continued use of the airstrips will not cause environmental degradation. 5) BLM would incur little or no maintenance costs. 6) There is no realistic liability exposure from noncommercial use to the Department of the Interior for these facilities.	Please see general comment response #21

Organization	Category	Comment	Response
		Inventory: Airstrips on Federal land that are not mentioned above, include: ---Cliff Dweller Flat ---Sage Brush Bench ---Sweetwater Reef An complete inventory of airstrips will be included in the mailed hard copy version of this comment, as an Addendum	
Utah Back Country Pilots Association	Vegetation	Weeds: With any recreational activity, there is the potential for the introduction of noxious weeds. However, aircraft are not “off road vehicles” and they don’t range off of runways. Aircraft structures have far fewer locations where weeds can adhere. Pilots avoid taxiing their aircraft through weedy areas to minimize the risk of encountering unseen holes and other obstacles, which cannot be said of other vehicles. The risk of weed propagation/introduction is considerably less than with other uses such as vehicles, boats, or livestock used for riding and packing, or grazing.	Please see general comment response #24
Utah Cattlemens Association	Livestock Grazing	Chapter 2, page 2-58 "Criteria for Voluntary Relinquishment and Disposition of Grazing Permits or Grazing Preference.": Policies are created in a different manner. If the NEPA process has been followed, then please refer us to the ANPR and public release for our comment. The DEIS portion of an RMP is not what Congress intended to be the platform for creation for new policies. Is it BLM's idea to attempt to have a policy approved in this plan, and then to apply it to all of the other RMP's across the west? The criteria presume to allow conservation use of grazing allotments in apparent disregard of the 1999 10th circuit court case under PLC v. Babbit. In which it was found that conservation use of grazing allotments is illegal under the TGA.	Please see general comment response #82
Utah Cattlemens Association	Livestock Grazing	2.3.2. Livestock Grazing: Page 2-5: Add bullet point: Manage grazing and allotments using the Rangeland Improvement Act and the Taylor Grazing Act, adhering to recent court decisions, applicable executive orders, county and state plans.	Please see general comment response #83
Utah Cattlemens Association	Livestock Grazing	Grazing Management in Pronghorn Ranges: page 2-41: Alternative D, with the following added language: Recognize and coordinate with valid existing rights and holders of grazing preferences, current livestock grazing prescriptions would continue and, where opportunities exist, would be adjusted to enhance forbs production on pronghorn antelope ranges.	Please see general comment response #103
Utah Cattlemens Association	Livestock Grazing	Gray Canyon Wildland Management Area (WMA) pages 2-41, 42: The No Action Alternative, with added language should be the Preferred Alternative: The Gray Canyon WMA would continue to be managed for wildlife, watershed, and recreation. Off-highway vehicle (OHV) use in Gray Canyon WMA is partially open and partially limited to designated routes, as is consistent with County plans. (See Map 2-12). Grazing is excluded, until such time as grazing removal has been shown to: · Disrupt the orderly use of the range, · Breach the Secretary’s duty to adequately safeguard grazing privileges, · Be contrary to the protection, administration, regulation and improvement of public lands within grazing districts, · Hamper the government’s responsibility to account for grazing receipts, or · Impede range improvements as foreseen by the TGA and FLPMA, · Have violated 1712(e)(2), of FLPMA, the appropriate regulations in CFR 4100. TGA or PRIA.	Please see general comment response #83

Organization	Category	Comment	Response
Utah Cattlemens Association	Livestock Grazing	Forage Allocation: Page 2-42: To allow purchasing of livestock AUMs for the specific purpose of using the forage for wildlife use is in opposition to 10th circuit court decision. Alternative D should be amended to state Congressional intent, Add: When monitoring data and best science identify an increase in available forage which are in Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUMs to levels historically designated when the grazing district was established, then any excess available forage will be reasonably allocated between livestock and wildlife. For increases in available forage in areas, which are not in grazing districts, allocation would be adjusted proportionately among wildlife and any permitted livestock use in the areas. When monitoring data and best science identify a decrease in available forage in areas, which are in Taylor Grazing Act grazing districts, such decrease will first be allocated to livestock in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decreases in available forage in areas, which are not in grazing districts, allocations would be adjusted proportionately between wildlife, and any permitted livestock use in the area.	Please see general comment response #83
Utah Cattlemens Association	Livestock Grazing	Actions Common to All Alternatives, p. 2-57: Add the following language to make this Appropriate: Manage grazing and rangeland health according to the Standards for Rangeland Health and Guidelines for Grazing Management for BLM lands in Utah, based on documented historical use and dependent on the availability of forage and water. Require livestock trail permit for any trailing activity that occurs on BLM-administered lands. Offer for application to graze, unallocated lands as available for livestock grazing unless documented and validated scientific monitoring shows that due to terrain, soils, vegetation, that the land is no longer chiefly valuable for grazing. Management decisions will be pursuant to the Taylor Grazing Act, and CFR 4100.	Please see general comment response #83
Utah Cattlemens Association	Livestock Grazing	p. 2-58: We suggest placing in this summary, the number of AUMs for each allotment, and the acreage involved next to the allotment name, to show the actual loss of active AUMs in the grazing district. We submit that before land in a grazing district becomes “no longer available for grazing,” BLM has the burden to show by documented monitoring and scientific data that the health or other factors of this land will no longer support livestock. BLM should also attempt to mitigate the loss pursuant to Sec 4110.3-2 (b) and/or Sec. 4110.3-3 (a) Implementing reductions temporary closure in permitted use. The TGA adequately addresses temporary reductions or closure due to certain conditions making removing grazing use un-necessary.	Please see general comment responses #82 and #83
Utah Cattlemens Association	Livestock Grazing	p. 2-58: Losing AUMs over the long term, by attrition, has caused much economic hardship for many ranchers and the local economies in the west. It is understood that grazing allocations may be adjusted for protection of resources on the public lands. It is our contention that to temporarily rest a needed area is healthy for the land. To lose livestock use on lands that have been historically grazed for 100+ years will change the balance of the land. This can have adverse, and sometimes devastating effects on the land in the long term. Designating lands no longer available for grazing is an un-acceptable action. Furthermore, this action is not consistent with Utah Cattlemen’s resolutions.	Please see general comment responses #82 and #83
Utah Cattlemens Association	Livestock Grazing	Areas Where Grazing Use Could Be Changed for Other Resource Purposes: page 2-58: Any alternative that would take away grazing without proper proof to support that decision is an unacceptable action, and is not consistent with Utah Cattlemen’s resolutions.	Please see general comment response #83
Utah Cattlemens Association	Livestock Grazing	Range Creek and Buckskin Allotments, p. 2-58; Forage in the Range Creek allotment would be allocated to other resource uses. (Refer to wildlife section concerning combining the Range Creek Allotment with Grey Canyon WMA) . This action is not consistent with Utah Cattlemen’s resolutions. We suggest that a local rancher, to conform to the intent of the TGA, put out the Range Creek allotment to application. The added AUMs could accommodate a rest rotation program throughout the area. This action would include much more land than just	See general comment responses #82 and #83. The portion of the DEIS referred to in the public comment (page 2-58) has been changed in the Proposed RMP/Final EIS. In the Proposed RMP, the Buckskin allotment would remain open for

Organization	Category	Comment	Response
		the allotment. Both public and private land would be involved, enhancing rangeland health for both wildlife and livestock in a larger area. It would also allow continuing stewardship to maintain range improvements, which benefits wildlife all tear. In good years it would allow UDWR and BLM to increase wildlife numbers, without AUM reduction or relinquishment. P. 2-58; Forage in the Buckskin allotment would be allocated to other resource uses. (56 AUMs): This action is not consistent with Utah Cattlemen's resolutions. The private land that this allotment is attached to is being considered for yet another land trade and it would be consistent with the TGA to have these AUMs stay in private livestock use.	livestock grazing in conjunction with other private land in the allotment. The Range Creek allotment would remain open for livestock use upon development of a prescriptive management plan including UDWR lands that would provide for wildlife objectives cooperatively developed by BLM and UDWR. In addition, the proposed plan and final EIS no longer address, on a field office-wide basis, the voluntary relinquishment of grazing permits and preference. Voluntary relinquishments, however, are still considered an option for portions of three allotments in the Desolation Canyon/Green River Corridor (page 2-59, Alternative D). The BLM believes that using voluntary relinquishments as a means to adjust land use plan allocations on these allotments, will help mitigate any adverse impacts to the permittees. No other changes are proposed at this time through a voluntary relinquishment process and any future proposals would be considered on a case by case basis. The Proposed RMP/Final EIS is consistent with FLPMA which provides for the development of land use plans for use of the public lands. The proposed prescriptive grazing management on the Range Creek allotment does not constitute the modification or elimination of a grazing district, and thus does not require direct Secretarial level involvement. The rationale for the prescriptive management of livestock grazing, coordination with UDWR, and meeting wildlife and livestock objectives on the Range Creek allotment is explained in the Proposed RMP/Final EIS and the administrative record adequately supports BLM's decision.
Utah Cattlemens Association	Livestock Grazing	"Criteria for Voluntary Relinquishment and Disposition of Grazing Permits or Grazing Preference": page 2-58: Provide for the voluntary relinquishment of grazing permits by willing permittees. Upon relinquishment, the CLM would consider reallocating livestock AUMs for other uses, for the life of the plan, after determining that lands are no longer "chiefly valuable for grazing and raising forage crops." The following criteria would be considered when making this determination. This list is not all-inclusive and the presence or absence of these criteria are not binding on the BLM to make a decision that an area or allotment is no longer "chiefly valuable for grazing and	Please see general comment response #82

Organization	Category	Comment	Response
		raising forage crops." Relinquishments may be developed through a subsequent land use plan amendment. We will actively oppose this proposal at all levels. The following underlined portions are a rebuttal view to the six criteria for relinquishments: 1. Other uses of the land serving public benefit; Grazing Preference is not subservient to other uses, the US Supreme Court concluded that, under the existing regulations, "a permit holder is expected to make substantial use of the grazing permit and that "the Secretary has represented to the Court that "[a] long-standing rule requires that a grazing permit be used for grazing." Slip Op. at 18-19. 2. Adverse terrain characteristics such as steep slopes. Even in an allotment with steep slopes, wildlife will be able to forage these slopes whether livestock is present or not. 3. Sensitive soil, vegetation, or watershed values; It is our contention that all of these potential threats to the health of the land increase when grazing is removed, however since monitoring stops when grazing is removed, no one knows. 4. Presence of noxious or poisonous weeds and other undesirable vegetation. 80% of noxious or poisonous week management in Utah is done by farmers and ranchers, and with personal funds, or program money, that only they are eligible to receive. 5. Presence of other resource values that may require special management/protection; It is our contention that most resource values are managed better with grazing present. The need for establishing grazing reserves. The Utah RAC removed this issue during the hearings on the Sustaining Working Landscaped Initiative last year, making this an inappropriate decision, without policy support. This addition to a DEIS for an RMP whose demeanor reflects a direct bias against livestock grazing for reasonable person reading the document, suggests an agenda. Your prompt reconsideration of this action would be in order. We expect that a review of current federal statutes will convince BLM at all levels of your tenuous position.	
Utah Cattlemens Association	Livestock Grazing	Reallocate AUMs Between Wildlife, Wild Horses and Burros and Livestock or Other Resources,: p 2-61: The preferred Alternative (D) should be amended to reflect Congressional language as follows: When monitoring data and best science identify an increase in available forage in HMAs which are in Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUM's to levels historically designated when the grazing district was established, then any excess available forage will be reasonably allocated between horses/burros and wildlife. For increases in available forage in HMA's, which are not in grazing districts, allocations would be adjusted proportionately among wild horses/burros and wildlife and any permitted livestock use in the area. When monitoring data and best science identify a decrease in available forage in HMA's, which are in Taylor Grazing Act grazing districts, such decrease will first be allocated between wild horses/burros and wildlife in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decreases in available forage in HMA's which are not in grazing districts, allocations would be adjusted proportionately between wild horses/burros, wildlife, and any permitted livestock use in the area.	Please see general comment response #83
Utah Cattlemens Association	Livestock Grazing	Administrative Access – Maintaining Motorized Vehicle Access for Range Improvement Construction and Maintenance: page 2-62: No action Alternative is preferred. Access for existing and future range projects would continue to be allowed on an allotment basis. In Chapter 1, Planning Criteria 1.5, Page 1-7, states, "BLM will	Please see general comment response #104

Organization	Category	Comment	Response
		continue to consider administrative access on a case-by-case basis."	
Utah Cattlemens Association	Process and Procedures	A fundamental flaw in the DEIS is that lack of basic foundation for making viable future decisions. It is of serious concern that the planning document does not adequately offer objectives upon which to base future activities.	Goals and objectives are described in Chapter 2 of the Proposed RMP/Final EIS.
Utah Cattlemens Association	Special Status Species	Special Status Species; Page 2-39; Goals: Appropriate, provided that Actions Common to all Alternatives are added to the EIS and final record. Maintain, protect. and enhance populations and habitats of BLM sensitive plant and animal species to prevent the listing of these species under the Endangered Species Act. Add: Provided that designations or reintroductions often grow beyond boundaries and scope and result in detrimental affects on the area economy, life styles, culture and heritage.	Please see general comment response #7. The suggested language has not been added since it is not stated in federal regulations.
Utah Cattlemens Association	Special Status Species	P.2-39: Maintain, protect, and enhance habitats (including but not limited to designated critical habitat) of federally listed Threatened, Endangered, or Candidate plant or animal species to actively promote recovery to the point that they no longer need protection under the Endangered Species Act. The above statement in parenthesis is not acceptable. Habitat management needs to include State of Utah Division of Wildlife Resources and local county participation. This management level decision is arbitrary and capricious when it restricts other uses on the land without the NEPA process. Recognize and support the role of the U.S. Fish and Wildlife Service (USFWS) in managing federally listed Threatened, Endangered, or Candidate plant and animal species.	Please see general comment response #64. Recovery plans are coordinated among all stakeholders in order to ensure the effectiveness of the plans.
Utah Cattlemens Association	Special Status Species	Goals should include BLM acceptance, consultation, cooperation and consistency with state or county or organization's plans and actions to accomplish T&E protection. Add bullets: - such designation or reintroduction should be made until it is determined and substantiated by certified scientific data that there is a need for such action as provided by the Federal Data Quality Act. Habitat designation will occur only if protections cannot be provided by other methods and the area in question is truly unique when compared to other area lands. - Designation or re-introduction plans, guidelines, and protocols must not be developed or implemented without the full involvement of the State and County with full public disclosure. -Any analysis of such proposed designations or reintroductions must be inclusive and analyze all needed actions associated with the proposal to prevent growth beyond the scope and boundaries that were analyzed in the proposal. - Affected private property owners should not be persecuted and have their property rendered valueless when species are found on or near their property. - The burden of proof for taking of private of land will be validated by law and good science, and subject to Executive Order 12630, a talkings implementation assessment will be completed when proposed actions affect private lands.	Please see general comment response #64. Recovery plans are coordinated among all stakeholders in order to ensure the effectiveness of the plans.
Utah Cattlemens Association	Vegetation	2.2.3 Vegetation: To comply with the Taylor Grazing Act and related legislation and regulations, the first, second and third bullet points should be amended to read as follows: · Manage and mitigate activities to restore, sustain and enhance domestic livestock rangeland health, the health of plant associations, enhance and restore native and naturalized plant species, and enhance biological and genetic diversity of natural ecosystems. · Ensure that the amount, type and distribution of vegetation on public lands produces the kind, proportion and amount of vegetation necessary to enhance rangeland health to support the maximum number of domestic	Please see general comment responses #23 and #83

Organization	Category	Comment	Response
		livestock AUMs and to meet or exceed other management objectives for a given vegetative community. · Protect areas with relict vegetation without negatively impacting the historic levels of domestic livestock AUM's on Grazing Districts.	
Utah Cattlemens Association	Wild Horses and Burros	P. 2-46: Actions Common to All Alternatives: Appropriate with the added language: Allow introduction of wild horses and burros form other herd areas to maintain genetic viability, as long as the horses being introduced have characteristics similar to the horses in the HMA to which they are being introduced. Horse Management Plans must include provisions for periodic gathering of all horses in the unit to limit populations to planned levels, to remove trespass horses, and to test for equine diseases as prescribed by the Utah State veterinarian, and adopted County plans. Wild Horses assigned to herd units must be identified in such a way as to insure that feral or fugitive horses are not assimilated into wild horse herds on public lands. Remove natural and legal barriers, which prohibit the construction and maintenance of watering facilities, springs, seeps or ponds, which benefit livestock, or other wildlife. Amend as needed to manage according to latest Congressional decisions.	The 43 CFR 4700 series gives guidance on removal of wild horses and stray domestic stock, health and identification, maintenance, destruction, use of air craft, etc. During gathers all horses are inspected by the local brand inspector for brands and then each animal that is removed is tested for equine diseases and vaccinated. If a domestic horse is not marked in any way, unless it does not conform to the size and characteristics of the herd, it may or may not be easily identified as an introduced horse. Construction and maintenance of watering facilities are implementation decisions that are beyond the scope of the RMP.
Utah Cattlemens Association	Wild Horses and Burros	Forage Allocation, P-2-48: Alternative D preferred with added language: . for wild horses and 420 AUM's would not occur at the expense of domestic livestock grazing. If this is what is happening and the DEIS is not revealing it, then we are registering an objection, as no AUM's previously assigned and designated for domestic grazing may be shifted away from domestic livestock to other uses in grazing districts. Alternative D should be amended to comply with Congressional intent: When monitoring data and best science identify an increase in available forage in HMA's which are within Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUM's to levels historically designated when the grazing district was established, then any excess available forage will be reasonably allocated between horses/burros and wildlife. For increases in available forage in HMA's, which are not in grazing districts, allocations would be adjusted proportionately among wild horses/burros, wildlife and any permitted livestock use in the area. When monitoring data and best science identify a decrease in available forage in HMA's, which are in Taylor Grazing Act grazing districts, such decrease will first be allocated between wild horses/burros and wildlife in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decrease in available forage in HMA's, which are not in grazing districts, allocations would be adjusted proportionately between wild horses/burros, wildlife, and any permitted livestock use in the area.	Please see general comment response #96, The AUMs for wild horses and burros were set aside in previous plans; however the plans never specifically allocated them for wild horses and burros. The Final RMP will make the allocation. Future changes in allocation based on monitoring data will comply with Code of Federal Regulations Title 43 subpart 4710.5(a): "If necessary to provide habitat for wild horses or burros, to implement herd management actions or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock."
Utah Cattlemens Association	Wildlife and Fish	Fish and Wildlife, page 2-39; Actions Common to all Alternatives: Add: Wildlife numbers will remain at the allocated level until studies and analysis are completed to determine the ability of forage resources to support the increase and species population trends. -No increase in wildlife numbers or the introduction of additional species may be made until the increase in forage or habitat has been provided for. The impacts to other wildlife species will be assessed prior to managing for increase in introduction. For example, it has been theorized that elk numbers in our region are extreme, exceed historical populations, and are affecting the deer population.	Forage allocations are individually analyzed by each alternative in the Fish and Wildlife resource and the Livestock Grazing resource sections of the Proposed RMP/Final EIS. Regulation of the wildlife populations is the responsibility of the state of Utah. Predators would be controlled according to the MOU between APHIS and BLM. The off-site mitigation for habitat loss for the alternatives does

Organization	Category	Comment	Response
		- Reductions in forage allocation resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife as well as livestock. - Wildlife target levels and/or populations must not exceed the forage assigned to wildlife in the RMP forage allocations. -In evaluating a proposed introduction of wildlife species, priority will be given to species that will provide for increased recreational activities. - Predator and wildlife numbers must be controlled to a level that protects livestock and other private property from loss or damage and to prevent decline in populations of other wildlife species. - Through wildlife habitat mitigation banking, impact of development can be mitigated in a more efficient and planned manner. When implemented, this system could provide much-needed habitat for wildlife and livestock alike, while providing for multiple use.	not propose mitigation banking. Under the alternatives BLM would encourage willing partners to participate in off-site mitigation strategies.
Utah Cattlemens Association	Wildlife and Fish	Predator Control, page 2-40; Alternative B: Predator control action will be implemented by allotment area individually through proper revisions to the MOU with APHIS to target species-specific needs for livestock grazing. Alternative D, with the following added language: Recognize and coordinate with valid existing rights and holders of grazing preferences. Big game winter range would be managed to maximize browse production, using class of livestock and season of use.	Please see general comment response #47. Under current regulations permittees must be consulted.
Utah Division of Aeronautics	Transportation and Access	Please accept this letter as support for alternative D... Being able to access this beauty using light aircraft provides visitors a low impact means to enjoy it. Each year I receive numerous requests from recreational pilots across the country for copies of Utah's aeronautical chart.. Did you know that Utah's third busiest commercial service airport (behind Salt Lake International and St George) is a private dirt landing strip?.. Utah's back country landing strips are a valuable resource, and I appreciate the BLM identifying four of them (Mexican Mountain, Hidden Splendor, Cedar Mountain and Sage Brush Flat/Peter's Point) for "continued use" in the Support/Transportation portion of the proposed RMP. There are other back country landing strips that act as low impact gateways to Utah's beautiful recreational areas. I ask that the BLM also give consideration to these strips.	Please see general comment response #21
Utah Farm Bureau Federation	Livestock Grazing	The Utah Farm Bureau Federation is the largest general farm organization in the state of Utah representing over 20,000 member families. We represent a significant number of livestock producers who use the federal lands for livestock grazing. During our November, 2004 annual state convention, our delegates reaffirmed Farm Bureau's long standing commitment to multiple-use management of the public lands and that the Taylor Grazing Act mandated that grazing rights be safeguarded. Utah Farm Bureau Federation delegates reaffirmed support of "multiple use concepts in management of natural resources on public lands by local, state and federal land management agencies." Utah Farm Bureau commends the Bureau of Land Management's current efforts to better focus grazing regulations to reflect the social and economic contributions livestock ranching makes in the public lands states of western American. Through prudent application of multiple-use principles, renewable and abundant resources can be wisely used while protecting the many unique and sensitive parts of our state. The Taylor Grazing Act protects the historic rights of Utah ranchers and ultimately is the foundation for economic stability in our rural communities.	Please see general comment response #33 and #132

Organization	Category	Comment	Response
		In a recent telephone conversation between Secretary of Interior Gale Norton, BLM Director Kathleen Clarke and Farm Bureau presidents from public lands states, Secretary Norton declared the official position of the Department opposing retirement or transfer of livestock grazing rights. More recently, BLM Deputy Director Jim Hughes, speaking at the annual convention of the Utah Farm Bureau Federation November 18, 2004 said, the Interior Department is committed to the foundation principles of the Taylor Grazing Act and allocation of grazing resources, first to livestock. He further pointed out that the new grazing rules will reflect the agency's commitment to livestock grazing rights and the important historic, cultural and economic contribution public lands ranching makes in the Western United States. Farm Bureau delegates reaffirmed a long standing policy supporting "livestock grazing as an integral part of multiple use and the management of the natural resources." Livestock production is the foundation of Utah's agriculture industry, contributing 78 percent of our state's $1.2 billion in farm gate sales. This contribution and its economic ripple effect are significant in rural Utah. In recent years, Utah has become one of the most urban states in the nation. Rural communities continue to be left out of the economic investment and revitalization that is focused along the Wasatch Front. Multiple-use of the public lands is critical to the economic well-being of rural Utah. The mix of private and public lands ranching for generations has created new wealth through the harvest of annually renewable forage that drives our rural economies. In addition, livestock grazing of the public lands provides a benefit to all Americans, not just those physically and financially able to visit the public lands states. In the Taylor Grazing Act, Congress gave the agency, at the local, state and national levels, the obligation and responsibility to protect and safeguard livestock grazing rights. Any decision by the agency that would impact the economic contribution, jobs, culture and historic use must be consistent with Congressional mandates.	
Utah Farm Bureau Federation	Livestock Grazing	The Price RMP - 2.14 Alternative C, proposes changes in grazing management including, "reallocation of forage in allotments that have not been grazed by livestock in recent years… as well as reallocation of some AUMs from livestock to wildlife." Utah Farm Bureau policy supports "restoration of suspended non-use and active non-use or increased animal unit months to existing permittees when range monitoring clearly demonstrates an upward trend in carrying capacity, including recovery from drought conditions." If the grazing resource is suitable for grazing, then the resource is mandated to be made available to a qualified rancher. No retirement, non-use or reduced AUMs by the agency due to degraded range status, would therefore make sense to transfer livestock grazing rights to wildlife grazing. Utah Farm Bureau is concerned that the Price Field Office in its Resource Management Plan is proposing reallocation "from livestock to wildlife," clearly in violation of federal law (Taylor Grazing Act) and the stated position of the agency's administrative officers. Farm Bureau opposes the use of the planning process (Alternative C) by a Price Field Office to try and circumvent the longstanding principle "chiefly valuable for grazing" mandated in Taylor Grazing. The BLM land use planning process only provides authority to regional offices to make minor changes and temporary adjustments to restore rangeland health. Furthermore, Solicitor Myers' found that the Secretary of Interior (BLM) cannot "establish, eliminate or modify the	Please see general comment responses #82 and #83

Organization	Category	Comment	Response
		boundaries of a grazing district without determining that the affected ground displaced from grazing is no longer chiefly valuable for grazing." The Price RMP or any other BLM field office proposing transfer of livestock grazing to wildlife grazing clearly violates the "chiefly valuable" doctrine.	
Utah Farm Bureau Federation	Livestock Grazing	The Federal Land Policy and Management Act (FLPMA) did not set aside or adversely impact the foundation principles of the Taylor Grazing Act and the grazing preference. In fact, it preserved them. FLPMA 43 U.S.C Section 701(b) cites: "shall be construed to and not in derogation of the purposes for which public lands are administered under other provisions of law."	Please see general comment responses #33 and #83
Utah Farm Bureau Federation	Livestock Grazing	As BLM field offices make minor changes and temporary adjustments to address rangeland health, the Utah Farm Bureau recommends they be broad based. Past experience has shown that BLM resource managers focus attention on easily identified livestock inventories for reductions while not making similar demands of the state's wildlife managers. Farm Bureau policy supports, "a reduction in wildlife, wild horses and burros on public land … when livestock AUMs are reduced due to deteriorating rangeland conditions." Historically, under the Taylor Grazing Act, permits to graze federal allotments were awarded to ranchers based on their private lands and water rights. Economically viable ranching operations were developed with a mix of private lands and public grazing rights. Utah ranks second only to Nevada in the continental United States in percentage of federal land ownership. Utah's rural communities rely heavily on this partnership between livestock producers and public land managers. When public land access and use is denied, the limited private lands are generally sold off hurting wildlife habitat, quality of life and long term economic contributions to the local economy.	Please see general comment response #83
Utah Farm Bureau Federation	Livestock Grazing	Utah is a public land state. It is estimated that over seventy percent of Utah's non-dairy livestock spend at least part of the grazing year on public lands. Many of our rural counties have in excess of ninety percent of their land base managed by federal agencies. Access, management philosophy and legal consistency are vitally important to ranchers and the rural communities they support. The Resource Management Planning process must recognize the contributions livestock grazing on public lands makes to, rangeland health, viable ranching operations and rural communities. The Utah Farm Bureau Federation appreciates the opportunity to provide comments. Thank you for your consideration.	BLM recognizes the impact public lands have on the livelihood and economy of local communities. BLM has and will continue to work closely with local communities to consider the needs of the parties involved as directed by law, regulation, and policy. The analysis of Social and Economic Impacts has been expanded for the Proposed RMP/Final EIS. See general comment response #132.
Utah Farm Bureau Federation	Socioeconomics	Agriculture and related industries are the catalyst for more than 100,000 Utah jobs. In the annual Economic Report to the Governor, the value and importance of cattle and sheep operations is graphically presented. 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 is considerably above the statewide median jobs multiplier of 20.3. From a micro economic view, it is important to recognize the impact of displacing even an average sized cattle or sheep operation. Consider the following: An average cow-calf operation with 500 mother cows creates a direct impact on the local economy of over $275,000 in farm gate sales. This is based on a ninety-five percent calf crop, 550 pound feeder calves marketed and a market price of $1.15 per pound. Utah Department of Agriculture & Food Market Reporting Service for the week ending November 17, 2004 reports 550-600 pound feeder cattle $1.03-$1.26 per pound.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4 section 4.6.

Organization	Category	Comment	Response
		An average sheep operation with 2,000 ewes would create a direct impact on our rural economies of $ 250,000 in farm gate sales. This figure is based on one hundred percent lamb crop, 125 pound market lambs and a market price of $1.00 per pound. The Colorado market report for November 24, 2004 shows100-109 pound feeder lambs $1.10 per pound. The impact doesn't end at the farm gate. Economists agree that livestock sales have greater impact in rural communities than in the state aggregate. Using a conservative multiplier of 2.5, (Oklahoma State University reports 2.72 Livestock Multiplier) either of the average sheep or cattle operations would create over $600,000 in economic activity and provides the engine for 35-40 jobs in their communities.	
Utah Mining Association	Minerals and Energy Resources	UMA supports either Alternative A (allow maximum access and development of mineral resources) or Alternative D (BLM's preferred alternative which provides for a wide variety of resource needs). We are pleased to see that the Bureau of Land Management (BLM) recognizes the critical importance of the coal industry to the local, regional and State economies.	Please see general comment responses #71 and #132
Utah Mining Association	Minerals and Energy Resources	UMA also agrees with the BLM's conclusion that coal mining on lands under purview by the Price Field Office will not have any significant impact on: • Air quality • Soil, water and riparian areas • Vegetation resources • Paleontology resources • Cultural resources (not anticipated to be significant because of required mitigation measures) • Visual resources • Special status species • Wild horses and burros • Fire and fuels management • Forest and woodlands • Livestock • Recreation • Lands and realty • Wilderness study areas • Areas of critical environmental concern • Wild and scenic rivers • Transportation and motorized access • Hazardous materials and waste	Please see general comment response #18
Utah Mining Association	Socioeconomics	With its long history of demonstrated success of operating in an environmentally responsible fashion on Forest Service and BLM lands, it is not necessary or desirable to declare the Utah coalfields highly off limits. This outcome would cause electric rates in Utah to rise significantly, impacting economic competitiveness and development throughout the State. In addition, it would also harm the local economies that are highly Utah dependent on the Utah coal industry for primary and secondary jobs.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of coal production to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, section 4.6. See general comment

Organization	Category	Comment	Response
			response #132.
Utah Mining Association	Wilderness	BLM notes the presence of 11 Wilderness Study Areas (WSA) with the Price Field Office area, including Desolation Canyon, Turtle Canyon, Jack Canyon, Muddy Creek, Sids Mountain, Devils Canyon, Crack Canyon, San Rafael Reef, Horseshoe Canyon (North), Mexican Mountain and Link Flats ISA. The DEIS correctly notes that these WSA's cannot become Wilderness Areas without Congressional Action. The DEIS also notes that none of these WSA's would be impacted by coal mining, either by existing mining operations, or under the reasonable foreseeable development analysis. It is important that the BLM restrict the consideration of WSA's to those listed above. The Manti LaSal National Forest, as part of their Forest Planning Process, is currently trying to evaluate roadless areas for wilderness potential. The Forest Service proposal would reduce the number of inventoried roadless area acres in some parts of the Manti LaSal National Forest, but would add acreage in other parts. Some of the added acreage occurs on the Wasatch Plateau coal fields, and includes parts or all of the several SITLA coal tracts conveyed as a result of the Grand Staircase Escalante (see previous discussion). These additional acres are outside of the inventory conducted as part of the 1979 Rare II Study, and therefore cannot be considered as Wilderness Study Areas, or ultimately as Wilderness Areas.	Please see general comment response #114
Utah Rivers Council	Wild and Scenic Rivers	Classification: Classification of rivers as wild, scenic or recreational is an assessment of the degree of development in the river corridor. The draft RMP acknowledges this reality in Appendix 3 where it states "…each river segment is given one of three tentative classifications – wild, scenic, or recreational – based on the degree of development." But then the draft RMP goes on to muddle the clear language of the Wild and Scenic Rivers Act by finding the same sections of the Green River "wild' in alternatives B and C, while finding them "scenic" in alternatives A and D. Similarly, the San Rafael River is found to be a mix of "wild" and "scenic" in Alternative C and only "recreational" in Alternative D. Classification is a relatively straightforward review of the degree of development in the river corridor, and not open to the degree of interpretation exercised here by the Price BLM. The Green River is largely a "wild" river in the Price BLM's jurisdiction, with several "scenic" and "recreational" sections along the way – see specific recommendations later under our "river specific comments" section. The San Rafael River is similarly largely a "wild" river, with short "scenic" sections where road access is available – again, see specific recommendations later under our "river specific comments" section. There is no basis in statute for the alternative classification schemes proposed under different Alternatives in the draft RMP. The classifications in Alternative D – the preferred alternative – are particularly ill founded and not at all based in the reality of development on the ground. Much of the Green River area is undeveloped and primitive as referenced time and again throughout the draft RMP itself. Classification is not to be used to address political concerns or other factors – it is simply a way on representing the extent of development in the river corridor. We respectfully request that the Price Field Office use the classifications documented in Table 5 of the report, with the exceptions and additions noted later in these comments.	Please see general comment responses #25 and #148
Utah Rivers Council	Wild and Scenic Rivers	The Utah Rivers Council is extremely concerned with the approach to suitability reviews provided in the draft. Seven suitability factors were considered, but in many cases the "notes" section was blank or muddled. More importantly, the basis for rejecting segments as unsuitable was not provided except in two cases (Fish Creek and	Please see general comment response #25

Organization	Category	Comment	Response
		Gordon Creek). Nowhere in the draft documents does the Price BLM share how they evaluated the factors to come to a decision about suitability. Because of this disconnect, the draft RMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible.	
Utah Rivers Council	Wild and Scenic Rivers	Price River: This river was first identified for Wild and Scenic designation in 1979, and offers boaters, hikers, hunters and anglers an opportunity to explore dramatic canyons only two hours from the Wasatch Front. Recommendations: We whole-heartedly support the finding of eligibility for the Price River and support the following classifications, as listed in Table 5 of the draft RMP Appendix 3, for the Price: · Confluence of Fish Creek and White River to Poplar Street bridge in Helper: Recreational; · Mounds bridge to Book Cliffs escarpment: Scenic; · Books Cliffs escarpment to mouth: Wild The Council recommends that these stretches of the Price be found suitable for wild and scenic status and classified in the manner listed above. Outstandingly Remarkable Values: Recreational: The Price River qualifies for protection under the recreational ORV. Each spring the Price provides an opportunity to float a roadless gorge, with stretches varying from Class 1 to Class 5. During the summer and fall, the Price offers hikers and others solitude in a beautiful canyon. From where it leaves Scofield Reservoir to the Highway 6 crossing, the Price River has been designated as a Utah Blue Ribbon Fishery. Fish/Wildlife: The Price qualifies for designation under the fish and wildlife ORVs. The Price River provides important habitat for desert bighorn sheep, mountain lion, black bear, and mule deer. Sightings of the black-footed ferret have occurred along the Price. As one of the largest tributaries of the Green, the Price could provide prime spawning habitat for the pike minnow, the humpback chub, and the bonytail chub. Scenic/Geologic: The scenic and geologic qualities of the Price qualify the river for protection. The Price River flows though 1,000-foot deep canyons to its confluence with the Green. The geology of the basin is incredible – with large formations, deep canyons, and unique pinnacles. The river has created a deep canyon of unique sandstone gorges and pinnacles not present in other areas of the Book Cliffs. In addition, unique illustrations of geologic processes are exposed in the exposed cliffs. Historic/Cultural: The Price qualifies for protection under the historic and cultural ORVs. Several Native American petroglyph panels have been found along the river. Butch Cassidy and the Wild Bunch reportedly used the Price River canyon as a route between Green River and Salt Lake City.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	Additional River Comments; Rivers found not to have ORVs: The Utah Rivers Council disagrees with the BLM's finding that the rivers listed below have no Outstandingly Remarkable Values of at least regional significance. For evidence supporting the eligibility and suitability of these streams and rivers, see A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council (1997). We will not reproduce the text here, but incorporate it by reference into these comments. · Cottonwood Wash: qualifies for wildlife; scenic/geologic	The Price Field Office used the 1997 publication "A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council" during the evaluation of rivers potentially eligible as congressionally designated Wild and Scenic Rivers. This information aided in the identification of outstandingly remarkable values for various steams

Organization	Category	Comment	Response
		· Chimney Canyon (see comments on Muddy Creek) · Saddle Horse Canyon Creek: qualifies for scenic · Salt Wash, North: qualifies for wildlife, recreational, ecological (rare plants), and scenic/geologic. We respectfully request supporting evidence for the BLM's claims that the values in these areas do not rise to at least the regional level. Rivers found eligible but not recommended as suitable in preferred alternative: The Utah Rivers Council objects to the finding that the rivers listed below are not suitable for wild and scenic status under the preferred alternative, and several of the other alternatives. No evidence is provided to support their exclusion, and the suitability process generally is flawed – see earlier comments under "broad policy comments." · Barrier Creek · Cane Wash · Cottonwood Wash · Eagle Canyon · Devils Canyon · Muddy Creek (detailed comments provided above) · Nine Mile Creek · North Salt Wash · Price River · Range Creek · Rock Creek · Portions of the San Rafael For evidence supporting the eligibility and suitability of these streams and rivers, see A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council (1997). We will not reproduce the text here, but incorporate it by reference into these comments. In addition, we underline the fact that the BLM has provided no evidence to support excluding these streams and rivers from the preferred alternative, as well as alternatives A and B (with the exception of Range Creek and the lower Price). The Council looks forward to working with BLM staff to address the ideas presented in these comments and to moving the Wild and Scenic process forward in the Price Field Office area. Thank you again for your work on the draft RMP and for your consideration of our comments. If you would like to discuss any of the information provided here, please feel free to call me at 801-486-4776. Thank you again.	that resulted from BLM's review. In some cases, however, an interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. In these cases, a rationale is provided in Table 3 of Appendix 3 of the Draft RMP/EIS. Appendix C of the Proposed RMP/Final EIS explains the Wild and Scenic Rivers Study Process. Also see general comment responses #25, #27, #28, and #87
Utah Rivers Council	Wild and Scenic Rivers	Classification of rivers as wild, scenic or recreational is an assessment of the degree of development in the river corridor. The draft RMP acknowledges this reality in Appendix 3. But then the draft RMP goes on to muddle the clear language of the Wild and Scenic Rivers Act by finding the same sections of the Green River "wild' in alternatives B and C, while finding them "scenic" in alternatives A and D. Similarly, the San Rafael River is found to be a mix of "wild" and "scenic" in Alternative C and only "recreational" in Alternative D. Classification is a relatively straightforward review of the degree of development in the river corridor, and not open to the degree of interpretation exercised here by the Price BLM. The Green River is largely a "wild" river in the Price BLM's jurisdiction, with several "scenic" and "recreational" sections along the way – see specific	Please see general comment responses #25, #28 and #148

Organization	Category	Comment	Response
		recommendations later under our "river specific comments" section. The San Rafael River is similarly largely a "wild" river, with short "scenic" sections where road access is available – again, see specific recommendations later under our "river specific comments" section.	
Utah Rivers Council	Wild and Scenic Rivers	There is no basis in statute for the alternative classification schemes proposed under different Alternatives in the draft RMP. The classifications in Alternative D – the preferred alternative – are particularly ill founded and not at all based in the reality of development on the ground. Much of the Green River area is undeveloped and primitive as referenced time and again throughout the draft RMP itself. Classification is not to be used to address political concerns or other factors – it is simply a way on representing the extent of development in the river corridor. We respectfully request that the Price Field Office use the classifications documented in Table 5 of the report, with the exceptions and additions noted later in these comments.	Please see general comment responses #25, #28 and #148
Utah Rivers Council	Wild and Scenic Rivers	Nowhere in the draft documents does the Price BLM share how they evaluated the factors to come to a decision about suitability. Because of this disconnect, the draft RMP's suitability determinations are not supported by substantial evidence on the record and so are not defensible. The seven factors that were considered are incomplete. It does not appear that the Price BLM considered the support of the public for designation (although local governments were considered) nor is there any sign that the contribution of the river segment to the overall integrity of the river system was considered using the approach recommended by the Interagency Wild and Scenic Rivers Coordinating Council and involving the public throughout the process.	Please see general comment response #25
Utah Rivers Council	Wild and Scenic Rivers	The Green River qualifies for protection under both the fishery and wildlife ORVs. It is hard to overstate the importance of the Green River within the Price Field Office's management area for fish. As detailed in the draft RMP, the area is home to four federally listed fish species – the pike minnow, the humpback chub, the bonytail chub and the razorback sucker. Protecting the Green River is critical to recovery of these four species. Many terrestrial species rely on the Green River corridor for habitat. The corridor provides important habitat for bighorn sheep, mule deer, elk, river otter, black bear, mountain lion, and many other species. Avian species abound in the river corridor. Federally listed species utilizing the river area include: bald eagle, southwestern willow flycatcher, and the Mexican spotted Owl. Countless songbirds, shorebirds, and migratory waterfowl depend on the river as a stopover on their long migratory journeys.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The Green River qualifies for protection under the ecological ORV. As described under the Fish/Wildlife ORV section, the area is home to an incredibly diverse array of species and to rare (listed) species. The area is also home to rare plant species. The ecological function of the Green River corridor is critical to the survival of these species.	Please see general comment responses #27 and #28
Utah Rivers Council	Wild and Scenic Rivers	The Green River qualifies for protection under both the historic and cultural ORVs. The history of the Green River is in large part the history of exploration and settlement in Utah. Many historic sites are well preserved due to the isolated nature of the area, and much of the corridor within Desolation Canyon is designated a National Historic Landmark. The cultural value of the Green River corridor is overwhelming. Sites in the area represent multiple cultural periods and the sites are well preserved due to the isolated nature. Many sites are eligible for inclusion on the	Please see general comment responses #25 and #27

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		National Register of Historic Places.	
Utah Rivers Council	Wild and Scenic Rivers	It nearly goes without saying that the Green River qualifies for protection under the recreational ORV. The Green River is one of the premier recreation destinations in Utah. The Labyrinth Canyon area of the Green is used by canoers, hikers, campers, and even power boaters – allowing many different types of visitors to enjoy the river experience.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The Green River qualifies for protection under both the geologic and scenic ORVs. The two values are closely tied together on the Green, with the geologic majesty creating a scenic masterpiece. In Labyrinth Canyon, the Green meanders through a deep canyon where cliffs of 1,000 feet tower over the river and the river has created beautiful Horseshoe Bend and Bowknot Bend.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for wild and scenic status under both the fisheries and wildlife ORVs. The river is home to important fish species including the federally endangered Colorado pike minnow, the state sensitive round-tail chub, speckled dace, flathead minnow, red shiner, flannel mouth sucker, and the bullhead sucker. The flows of the San Rafael also support diverse terrestrial species. The river corridor is home to desert bighorn sheep, coyote, Great Plains toad, bobcat, mule deer, gray fox, and many other species. The cliff walls and riparian forests provide nesting and prey habitat for peregrine falcons, American kestrel, golden eagle, and other birds of prey. The steep walled canyon sections of the river are potential habitat for the endangered Mexican spotted owl.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River easily qualifies for the geologic and scenic ORVs. In evaluating the San Rafael River area, the BLM classified the area as “Class A scenery due to the vertical relief, massive rock outcrops, unusual surface features, presence of the river, and vivid, rich color combinations.”	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for both cultural and historical ORVs. The San Rafael River is also rich in historical values, with sites associated with several eras.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for protection under the recreational ORV. The river and its corridor offer diverse, exciting recreational opportunities – ranging from hiking, camping, and birding to challenging canyoneering and wild boating or calm floats.	Please see general comment response#25 and #27
Utah Rivers Council	Wild and Scenic Rivers	We request clarification of the exact boundary of the final wild stretch of Muddy Creek and the reason(s) for drawing the boundary at that location.	The lower segment of Muddy Creek begins where South Salt Wash confluences with Muddy Creek and ends downstream of San Rafael and North Caineville Reefs where the county road fords the creek (Township 25 South, Range 9 East, Section 23). Table C-1 in Appendix C of the Proposed RMP/Final EIS correctly specifies North Caineville “Reef.” Because the Muddy Creek corridor is transected by roads just upstream of the confluence with South Salt Wash and downstream of the reef, the Muddy Creek was segmented accordingly. The segments tentatively classified as wild are mainly within Muddy Creek WSA and adjacent to Crack Canyon WSA, where there is very limited motorized access to the river area.

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Utah Rivers Council	Wild and Scenic Rivers	We request inclusion of Chimney Canyon as an eligible and suitable stream, classified as wild. Chimney Canyon qualifies under the recreational ORV. The Council recommends that the entire Muddy be found suitable for wild and scenic status and classified in the manner listed above. Nothing in the suitability tables within the draft RMP suggest that Muddy Creek is not suitable for protection. In fact, the land ownership status, multiple ORVs, and other factors support a suitable designation. Yet, the only Alternative that contemplates protection for Muddy Creek is Alternative C. Nothing in the draft RMP supports the proposal to find the Muddy unsuitable as envisioned in the preferred alternative – Alternative D.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	Muddy Creek qualifies for wild and scenic status under the recreational ORV. Although the dry nature of the canyon limits the runnable time of the year to May or early June, Muddy Creek is home to class 1 to 3 rapids. "Muddy Creek is a truly outstanding desert river….The Muddy Creek area is also a hiking, camping and canyoneering gem.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	Muddy Creek also qualifies for protection under the geologic and scenic outstandingly remarkable values.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	Price River: This river was first identified for Wild and Scenic designation in 1979, and offers boaters, hikers, hunters and anglers an opportunity to explore dramatic canyons only two hours from the Wasatch Front. Recommendations: We whole-heartedly support the finding of eligibility for the Price River and support the following classifications, as listed in Table 5 of the draft RMP Appendix 3, for the Price: • Confluence of Fish Creek and White River to Poplar Street bridge in Helper: Recreational • Mounds bridge to Book Cliffs escarpment: Scenic • Books Cliffs escarpment to mouth: Wild The Council recommends that these stretches of the Price be found suitable for wild and scenic status and classified in the manner listed above.	Please see general comment responses #25, #27 and #28
Utah Rivers Council	Wild and Scenic Rivers	The Price River qualifies for protection under the recreational ORV. Each spring the Price provides an opportunity to float a roadless gorge, with stretches varying from Class 1 to Class 5. During the summer and fall, the Price offers hikers and others solitude in a beautiful canyon. From where it leaves Scofield Reservoir to the Highway 6 crossing, the Price River has been designated as a Utah Blue Ribbon Fishery.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The Price qualifies for designation under the fish and wildlife ORVs. The Price River provides important habitat for desert bighorn sheep, mountain lion, black bear, and mule deer. Sightings of the black-footed ferret have occurred along the Price. As one of the largest tributaries of the Green, the Price could provide prime spawning habitat for the pike minnow, the humpback chub, and the bonytail chub.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The scenic and geologic qualities of the Price qualify the river for protection. The Price River flows though 1,000-foot deep canyons to its confluence with the Green. The geology of the basin is incredible – with large formations, deep canyons, and unique pinnacles. The river has created a deep canyon of unique sandstone gorges and pinnacles not present in other areas of the Book Cliffs. In addition, unique illustrations of geologic processes are exposed in the exposed cliffs.	Please see general comment responses #25 and #27

Organization	Category	Comment	Response
Utah Rivers Council	Wild and Scenic Rivers	The Price qualifies for protection under the historic and cultural ORVs. Several Native American petroglyph panels have been found along the river.	Please see general comment responses #25 and #27
Utah Rivers Council	Wild and Scenic Rivers	The Utah Rivers Council disagrees with the BLM's finding that the rivers listed below have no Outstandingly Remarkable Values of at least regional significance. For evidence supporting the eligibility and suitability of these streams and rivers, see A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council (1997). • Cottonwood Wash: qualifies for wildlife; scenic/geologic • Chimney Canyon (see comments on Muddy Creek) • Saddle Horse Canyon Creek: qualifies for scenic • Salt Wash, North: qualifies for wildlife, recreational, ecological (rare plants), and scenic/geologic. We respectfully request supporting evidence for the BLM's claims that the values in these areas do not rise to at least the regional level.	Please see general comment responses #25, #27, and #149
Utah Rivers Council	Wild and Scenic Rivers	The process for determining regional or national significance of outstandingly remarkable values (ORVs) is unclear and not well documented. No explanation is provided of the process used to sort values using the ecological sections. The Council respectfully requests that the Price Field Office provide the public and the Council with information about the process used to determine regional or national significance so that we may review and comment.	Please see general comment response #149
Utah Rivers Council	Wild and Scenic Rivers	The seven suitability factors that were considered are incomplete. It does not appear that the Price BLM considered the support of the public for designation (although local governments were considered) nor is there any sign that the contribution of the river segment to the overall integrity of the river system was considered.	Please see general comment response #25
Utah Rivers Council	Wild and Scenic Rivers	We respectfully request that the Price Field Office conduct in depth suitability analysis of all the rivers and streams found eligible for protection (along with those nominated as eligible within these comments) using the approach recommended by the Interagency Wild and Scenic Rivers Coordinating Council and involving the public throughout the process.	Please see general comment response #25
Utah Rivers Council	Wild and Scenic Rivers	The process for determining regional or national significance of outstandingly remarkable values (ORVs) is unclear and not well documented. One paragraph in Appendix 3 names the ecological sections used in the determinations, but no explanation is provided of the process used to sort values using the ecological sections. In addition, it is not clear how historical or cultural values relate at all to the ecological sections filter. It is also not clear how national significance was gauged – and yet many of the rivers discussed in the draft RMP clearly have ORVs of national significance.	Please see general comment response #149
Utah Rivers Council	Wild and Scenic Rivers	The Utah Rivers Council respectfully requests that the Price Field Office provide the public and the Council with information about the process used to determine regional or national significance so that we may review and comment. In addition, we disagree with the assessment provided of no ORVs of at least regional value for several specific streams – see "additional river comments" for the specific streams.	Please see general comment response #149
Utah Rivers Council	Wild and Scenic Rivers	The Council recommends the following tributaries as eligible and suitable: • Cane Wash • North Salt Wash • Eagle Canyon Creek • Devils Canyon Creek For evidence supporting the eligibility and suitability of these streams and rivers, see A Citizen's Proposal to Protect the Wild Rivers of Utah by the Utah Rivers Council (1997). We will not reproduce the text here, but incorporate it by reference into these comments.	Please see general comment response #27

Organization	Category	Comment	Response
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for wild and scenic status under both the fisheries and wildlife ORVs. The river is home to important fish species including the federally endangered Colorado pike minnow, the state sensitive round-tail chub, speckled dace, flathead minnow, red shiner, flannel mouth sucker, and the bullhead sucker. The flows of the San Rafael also support diverse terrestrial species. The river corridor is home to desert bighorn sheep, coyote, Great Plains toad, bobcat, mule deer, gray fox, and many other species. The cliff walls and riparian forests provide nesting and prey habitat for peregrine falcons, American kestrel, golden eagle, and other birds of prey. The steep walled canyon sections of the river are potential habitat for the endangered Mexican spotted owl. Geologic/Scenic: The San Rafael River easily qualifies for the geologic and scenic ORVs. The San Rafael River flows through the San Rafael Swell, one of Utah's most interesting geologic formations. The Swell is 70 miles long and 35 miles wide, and the San Rafael flows through its northern half. The San Rafael River has cut through and exposed layer upon layer of geologic time: Carmel, Navajo, Kayenta, Wingate, Chinle, Moekopi, Sinbad, Kaibab, and Coconino strata line the massive river canyon. Both the Lower and Upper Black Box dramatically illustrate the susceptibility of Coconino Sandstone to water erosion.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for both cultural and historical ORVs. Under the cultural ORV, the river area has been shown to have had significant occupation by prehistoric peoples representing several cultural periods. The San Rafael River is also rich in historical values, with sites associated with several eras.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	The San Rafael River qualifies for protection under the recreational ORV. The river and its corridor offer diverse, exciting recreational opportunities – ranging from hiking, camping, and birding to challenging canyoneering and wild boating or calm floats. The San Rafael River and its tributaries offer amazing hiking and camping opportunities. The San Rafael River area is also well known for excellent birding opportunities.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	The inclusion of Chimney Canyon as an eligible and suitable stream, classified as wild: Chimney Canyon qualifies under the recreational ORV.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	The Council recommends that the entire Muddy be found suitable for wild and scenic. Nothing in the suitability tables within the draft RMP suggest that Muddy Creek is not suitable for protection. In fact, the land ownership status, multiple ORVs, and other factors support a suitable designation. Yet, the only Alternative that contemplates protection for Muddy Creek is Alternative C. Nothing in the draft RMP supports the proposal to find the Muddy unsuitable as envisioned in the preferred alternative – Alternative D.	Please see general comment response #25
Utah Rivers Council	Wild and Scenic Rivers	Recreational: Muddy Creek qualifies for wild and scenic status under the recreational ORV.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	Muddy Creek qualifies for protection under the geologic and scenic outstandingly remarkable values.	Please see general comment response #27
Utah Rivers Council	Wild and Scenic Rivers	Fish and Wildlife: Muddy Creek is one of the few, reliably perennial streams in the San Rafael Swell. The creek provides valuable riparian habitat for gray fox, kit fox, bobcat, coyote, ringtail cat, badger, golden eagle, prairie falcon, American kestrel, red-tail hawk, ferruginous hawk, and rough-legged hawk. Muddy Creek also supports populations of Woodhouse's toad, Great Plains toad, speckled dace, flannel mouth sucker, bluehead sucker, and roundtail chub.	Please see general comment response #27
Utah Shared Access Alliance	ACEC	RE: Additional ACEC's Simply put: there is no need. We object to the proposal to designate additional ACECs because BLM has failed to identify a prevailing need to protect significant values associated with these areas No justification is given regarding fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened resources in proposed ACEC's. Designation of additional ACEC's (below) is arbitrary and capricious. BRC/USA-ALL strongly opposes any ACEC designated for "Natural Process". BLM lacks authority to manage for subjective resources such as "natural process".	Please see general comment response #129

Organization	Category	Comment	Response
Utah Shared Access Alliance	Alternative Maps	The DEIS does not contain adequately detailed maps, therefore preventing our members and the public from understanding, and therefore commenting upon, the specific trail designations at issue. BLM has failed to adequately research and document right-of-way ownership within the PFO, resulting in assertion of BLM jurisdiction over state, county and/or private property.	Please see general comment responses #11, #31, #32 and #39
Utah Shared Access Alliance	Alternative Maps	BLM's OHV Route Designation Map for the Preferred Alternative includes nearly 100 miles of paved roads! In fact, the vast majority of the 'green lines' BLM has represented to the public as "open for OHV use" (Map 2-56) are currently closed to unlicensed, OHV use. The vast majority of the routes represented on Map 2-56 are not under BLM's jurisdiction. Their use by vehicles is governed by County ordinance pursuant to State Law. While BRC/USA-ALL acknowledges the importance of cooperation between adjacent jurisdiction when formulating OHV Route Designation Plans, we think representing the `green lines' on Map 2-56 as open for OHV use is misleading.	Please see general comment responses #31 and #78
Utah Shared Access Alliance	Alternative Maps	Similarly, the DRMP/DEIS refers to the Chimney Rock/Summerville Trail System and the Arapeen Trail but fail to accurately depict these routes on any map or describe their location at all. Similar flaws exist on all OHV Route Designation Maps in the Appendix. This presents a situation where it is simply impossible for the public to compare and contrast the Alternatives.	Please see general comment responses #20 and #31
Utah Shared Access Alliance	OHV Route Identification	BRC/USA-ALL understands and generally supports BLM's Standards and Guidelines for Recreation in Utah. We also support management guidance regarding OHV use limited to designated roads and trails, except for managed and designated "open OHV areas". It is our strong desire to see BLM develop a sustainable OHV trail systems that provide a quality experience to the recreating public while minimizing environmental effects. It would have been our preference to have a wide range of alternatives with specific trail designations available for the public and decision makers to compare and contrast. It would have been our preference to have a consistent set of maps available at the public meetings. Sadly, among other fatal flaws, the DEIS/DRMP fails to describe existing routes or use patterns, misinforms the public on which roads and trails would be available for OHV use under the action alternatives, and fails to describe managed open areas. This makes it impossible to comment on route designations in any action alternative.	See general comment responses #2, #19 and #20.
Utah Shared Access Alliance	OHV Route Identification	BRC/USA-ALL recommends the following approach to OHV route designations: The BLM will restrict motorized wheeled cross-country travel yearlong except in managed "designated open" areas. BLM will publish a map of existing routes available for OHV use and allow 90 days public comment. BLM will allow for adjustment, addition and augmentation of the "existing routes" inventory map. The disposition of the inventoried routes culminates in a map, installation of signs and information kiosks in the area, public notice of travel restrictions, information and education efforts, and enforcement of the travel restrictions. Signing will be prioritized based on enforcement needs. Some signs could indicate an open road; some could indicate a closed road including barriers such as signs, gates, logs, rocks, brush piles, or segments of fence. If there are areas found "most suitable" for OHV use, signs and maps could be used to "feature" or "highlight" these areas in order to encourage use in these appropriate areas. Educational signs and bulletins could likewise be used to discourage use in areas that have particular needs, especially seasonally. Pursuant to a tiered OHV management plan (site specific planning), roads and trails would be analyzed to evaluate and identify opportunities for trail or road construction and/or improvement, or specific areas where intensive OHV use may be appropriate. Site-specific planning and inventory will be prioritized into High Priority areas, Moderate Priority areas, and Low priority areas. • High Priority Areas are those areas that currently have a high level of OHV use that has resulted in documented resource damage and/or resource user conflict (social conflict is not a consideration). Site-specific planning will be initiated within 2 years of the Record of Decision (ROD). • Moderate Priority Areas are those areas that have moderate	The goals and activities suggested in the comment are not planning level decisions but may be addressed in an activity level travel management plan as the RMP is implemented. Also see general comment responses #15, #19, #20 and #132

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		OHV use. Site-specific planning will be initiated within 5 years of the ROD. • Low Priority Areas as those areas with minimal OHV use, with the exception of hunting seasons, and are somewhat remote. There are no specific requirements for initiation of site-specific planning for these areas. BRCIUSA-ALL supports the designation of "managed open areas" where appropriate. We believe local communities should provide BLM with information regarding areas suitable for this designation close to communities and with designated access to other OHV trails. We also believe a larger "managed open area" is suitable, manageable and eminently appropriate in the Mancos Shale hills surrounding Green River. We intend to provide BLM with specific area recommendations and management guidelines regarding a "`managed open area" near Green River as soon as it is possible. BRCIUSA-ALL recognize the need to give a broad range of recreational experiences to the public. The removal of open areas to motorized access denies individuals and groups the opportunity to experience the land off the beaten path. It is our belief that carefully managed open areas can be managed effectively in appropriate areas. They also lessen violations of the designated areas, by providing users this alternative cross country experience. While some areas may be inappropriate to allow for this type of travel, there are certainly other areas are suitable for the "managed open designation". At a future date, BRC / USA-ALL would like to meet with the PFO planning team to identify, plan, and structure these areas.	
Utah Shared Access Alliance	OHV Route Identification	OHV users, therefore, are unfairly criticized for the increase in "resource conflicts", and "proliferation of new, unplanned roads and trails". Although these are important concerns that must be addressed in this planning effort, the situation is not reflective of "out of control" OHV users as much as indicator of the unmet demand for recreational infrastructure.	Please see general comment response #19
Utah Shared Access Alliance	OHV Route Identification	The Final Plan should include areas where OHV trails can be constructed and maintained when demand increases. The existing network of roads and trails in the planning area should be considered an inventory with which to develop recreational trail systems.	Please see general comment response #19
Utah Shared Access Alliance	OHV Route Identification	The Final Plan should include the following Goals and Objectives for OHV management: Based on the BLM's OHV Strategy, the PFO's Pre Plan, the AMS and review of the Seeping Report, the following issues associated with OHV use should be presented in the Final Plan: Economics, access for physically challenged, recreational and family values benefits, value as a recreational resource, effective management, dispersal, law enforcement compliance with land use plan, user education, resource impacts, social conflict and safety. The Final Plan should include the following Goals and Objectives for each issue: Economics: Goal: "Manage OHV use in a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall rangeland health, vegetation, wildlife and other visitors. Objectives: · When possible, route OHV routes into adjacent communities. This should be accomplished during the route designation process. · Identify areas where local communities may post information regarding goods and services are available. This should be done during the OHV route implementation process or as needs arise. · Identify as many routes as possible that may be used for Jamborees and other organized events. This should be done during the route designation process. · Streamline the Special Recreation Permit application process. This should be accomplished immediately after the RMP is final. · The District Manager should make all site specific project level planning decisions as consistent as possible to the plans of adjacent communities. Access for physically challenged Goal: Provide a reasonable range of access opportunity to see the backcountry through OHV use by youth, the aging population and the physically handicapped. Objectives: · Primitive ROS should be designated only where existing uses are compatible, leaving as much of the planning area open for access by the disabled via vehicles. This should be accomplished whenever changes in ROS are contemplated. • Where appropriate, facilities should be constructed that are disabled access friendly. Recreational and family values benefits Goal: Through comprehensive	Chapter 4 of the Proposed RMP/Final EIS analyzes impacts of OHV management on social and economic conditions and on other resources and uses. Safety, enforcement, signing etc. will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. The goals and activities suggested in the comment are not planning level decisions but may be addressed in an activity level travel management plan as the RMP is implemented. Also see general comment responses #19, #20 and #81

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		inventories and detailed, yet understandable, mapping, provide a range of OHV trail riding opportunities that fulfill the experience desired by family outings. Objectives: · Identify as many routes as possible that may be used for Jamborees and other organized events. This should be accomplished in the OHV Route Designation Process · Identify areas suitable for large family gatherings. This should be accomplished in the OHV Route Designation Process · Identify areas suitable for large family gatherings along OHV routes. This should be accomplished in the OHV Route Designation Process · Identify areas where large groups can stop for lunch, view scenic overlooks etc. This should be accomplished in the OHV Route Designation Process Recreation Goal: OHV use is recognized as an acceptable use of the Public Lands. The goal should be to use proven recreation management principles to manage vehicle-based recreation that is sustainable, manageable and enjoyable. Objectives: · Routes should be designated that provide a variety of difficulty · Routes should be designated that provide a variety of experiences · Routes should be designated that provide opportunity for a variety of vehicle types · Routes should be designated that provide access to destinations • The integrity of the "loop" trail system should be maintained. Loop trails offer trail users a more desirable recreational experience • Spurs are suitable for destination features such as scenic overlooks, campsites, viewing historic and cultural resources etc. • These objectives should be accomplished during the OHV route designation process. Effective Management Goal: Actively manage 01-1V use by providing an extensive designated route trail system that satisfies the experience desired by OHV recreationists, which keys upon the monitoring factors of customer satisfaction, education, compliance and enforcement. Objectives: • Utah NRCC standardized route signing and marking will be used. • Maintain, reconstruct, and relocate designated OHV routes to reduce resource impacts • Emphasis should first be given to maintenance, reconstruction, and relocation of roads before closures are considered • Proper education programs and service programs must be an important focus of any Travel Plan. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, in order to reduce social conflict, the plan should provide for the education of pedestrian and equestrian users about the availability of areas that meet their recreation opportunity setting both in the PFO as well as on adjacent public lands or National Forests. • Where possible, agencies are encouraged to provide trailheads for popular trails. • The integrity of the "loop" trail system should be maintained. • Spurs are suitable for destination features such as scenic overlooks, campsites, viewing historic and cultural resources etc. • Trails, when closed, should be signed with an official, legitimate reason. Monitoring should be implemented to justify the reasons stated • The BLM will use all upgrading management techniques, such as, bridging, puncheon, realignment, drains, and dips to prevent closure or loss of motorized trail use. • Integrate the Utah State Trail Patrol Program and/or Good Will Rider Program into the Travel Plan • Establish OHV census collection points at road and trail collection points. Include an OHV category on all trail and road census sheets. • BLM should use valid recreational management principles, i.e., providing a variety of experiences, challenges, including loop trails, trails to breathtaking views, connecting existing routes etc. • Engage in cooperative management with OHV groups and individuals. • In order to properly address the increase in popularity of OHV use now and in the future, travel management alternatives should be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation measures. • Proper education programs and service programs must be an important focus of the Travel Plan. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, in order to reduce social conflict, the plan should provide for the education of pedestrian and equestrian users about the availability of areas that meet their recreation opportunity setting both in the Forest as well as on adjacent public lands or National Parks. Dispersal Goal: Closures are eminent in some areas and existing motorized will	

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		be displaced to other areas. In order to minimize impacts to the remaining roads, trails and areas open for OHV use the plan will allow for additional access and additional recreational opportunities in suitable areas. Objectives: • Keep as many routes open for motorized use • As appropriate, disperse all forms of recreational use in order to minimize impacts in any particular area • Disperse all forms of recreational use so as to minimize conflict and create a more desirable experience Law enforcement/compliance with land use plans Goal: Enhance OHV user accountability and responsibility to ensure common sense compliance among the majority of riders so that law enforcement can handle the small percentage of willful abusers. Goal: Educate recreationists on the potential resource impacts and user responsibilities of OHV use through partnerships with user groups, other agencies and the formal education system. Objectives: • Education will be the first line of action. Proper education programs and service programs will be an important focus of the Final Plan as well as the OHV Route Designation Plan. This emphasis will be a key part to avoiding and minimizing resource and social user conflicts. Educational programs could include use of mailings, handouts, improved travel management mapping, pamphlets, TV and radio spots, web pages, newspaper articles, signing, presentations, information kiosks with mapping, and trail rangers. • Incorporate the State of Utah, Division of Natural Resources, Department of Recreation, OHV Program Utah Trail Patrol into all management activities. • Incorporate local law enforcement into BLM law enforcement efforts. • Incorporate cooperative management effort (volunteer coordination) into the Final Plan and the OHV Route Designation Plan as the best method to instill a commitment from the agency to engage in volunteer management projects, which are the best method to increase compliance with rules and regulations. • OHV rules and regulations should be available at kiosks. • Accurate maps and information should be easily available to the public on PFO's website, where entering the PFO, local businesses and at Kiosks. • Utilize, and incorporate into the Route Designation Plan educational efforts such as the "Featured Ride" mapping program recently initiated by the Utah Parks and Recreation OHV program. Resource Impacts: Goal: Develop, maintain and reroute trail systems for OHV use that meet reasonable criteria for acceptable resource mitigation that is based on credible site specific science. Objectives: • Routes should be located to minimize damage to soil, watershed, vegetation, air, or other resources. This should be accomplished during the OHV Route Designation Process • Routes should be located to minimize harassment of wildlife or significant disruption of wildlife habitats. This should be accomplished during the OHV Route Designation Process Social Conflict Goal: Provide for a wide range of accessible and highly desirable recreation experiences and opportunities for visitors and community residents while protecting other resource values. Objectives: • Educate the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters. ,, • Educate vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encourage slower speeds and a more courteous ethic in these areas. • Re routing either use so as to avoid sections of roads or trails that are extremely poplar with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV routes. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc. • Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience. Safety Goal: Provide for a safe environment for OHV use, weighing expectations for risk and challenge, through identification of appropriate designated routes. Objectives: • Educating the vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encouraging slower speeds and a more courteous ethic in these areas. • Work with state and county on effective signing on county roads that allow unlicensed vehicles • Utilize standardized trail signing and marking in coordination with the Utah NRCC, including the standardized trail difficulty rating system for all OHV trails.	
Utah Shared Access Alliance	OHV Route Identification	Inconsistencies abound within DRMP/DEIS pertaining to OHV use making the document unintelligible. Another indication of the document's critical flaw is the inconsistency when describing management actions. One	The descriptions of management alternatives in the Draft RMP/EIS are not inconsistent but the

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		example: In section 1.6.10.1 Off-Highway Vehicle Use BLM states: OHV use has become a significant issue within the PFO. OHV use and management will be addressed in conformance with the BLM National OHV Strategy in an effort to resolve resource conflicts that pertain to other natural resources and provide for responsible OHV use. Existing OHV use categories and route designations will be reviewed and modified where needed to meet changing resource objectives. Within the limited category, BLM will designate specific roads and trails for OHV use. The 2003 San Rafael Motorized Route Designation Plan is incorporated by reference into this RMP. The document states that OHV route designations will be reviewed and modified where needed to meet changing resource objectives but also states that the San Rafael Motorized Route Designation Plan (the first time we've heard it called that) is incorporated by reference into the RMP. I can't tell you how many OHV enthusiasts who called BRC/USA-ALL offices to ask which is it: are route designations going to be reviewed and modified or is the San Rafael Route Designation Plan going to be incorporated into the RMP? It's a darned good question. The DRMP and DEIS contains conflicting information regarding the OHV area designations, in some places stating that "all OHV recreational activity will be subject to designated trails" (all alternatives DRMP/DEIS 2-86), but in other areas stating that "Small open areas for OHV use would be considered near local communities and managed by BLM" (Alternative A DRMP/DEIS 2-86).	Proposed RMP/Final EIS has been written and edited to provide more clarity than the Draft RMP/EIS. The San Rafael Route Designation Plan is common to all of the alternatives, and cross country OHV travel would be considered in areas under future R&PP leases adjacent to or near incorporated towns in previously disturbed areas. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV Route Designations for each of the alternatives analyzed in detail. However, as stated in Section 2.3, under Recreation Management Guidance Common to All Alternatives, non-motorized and motorized recreational trails will be addressed in activity level plans. Therefore, enforcement, signing, safety, etc. and modifications to designated routes will be considered in the future in activity level travel management plans. Also see general comment responses #19, and #20.
Utah Shared Access Alliance	OHV Route Identification	Another inconsistency is a reference in Chapter 2 to the popular Chimney Rock/Summerville trail systems and Arapeen Trail connector routes and implies they will be designated as open to vehicle use (see DRMP/DEIS 2-82, 2-83). Can the public reasonably assume these popular OHV routes will remain open? Who can say? The document is conflicting by not including any of these routes on any of the OHV route designation maps.	Please see general comment responses #19, #20, and #31
Utah Shared Access Alliance	OHV Route Identification	Maps displayed for public review at several public meetings bore no resemblance to maps contained in DRMP/DEIS. Additionally different OHV Route Designation Maps were displayed at different meetings.	Please see general comment responses #20 and #31
Utah Shared Access Alliance	OHV Route Identification	As we have described earlier in these comments, the BLM's route inventory is inadequate.	Please see general comment response #19
Utah Shared Access Alliance	OHV Route Identification	Beginning in early June 2003, even prior to the official start of the RMP planning process, BLM sought information regarding various resource uses and values including OHV routes. BLM was to have used information received when preparing a Draft Resource Management Plan. BLM received input that indicated the route inventory was a critical inventory need and OHV individuals and groups raised the issue with PFO staff. Staff indicated there was no budget for comprehensive route inventories so local citizens began to document existing travelways. Citizens worked with PFO's G1S specialist to develop data useful for BLM in making OHV use allocation decisions. Instead of incorporating the information received from the public as required by law, BLM deliberately ignored virtually all of the data. BLM employees made assurances to interested parties that their input would be considered, yet, those assurances were never followed through. As a result, the OHV Route Designation maps in the Appendix are fatally flawed and none of them represent a meaningful management alternative. This situation makes it impossible to compare, contrast and comment on the action alternatives. Additionally, Routes will be closed in all action alternatives that were not seriously considered in the, planning process because input from interested publics was discarded or deliberately ignored. This deliberate denial of input is indicative of a bias against OHV use in general and motorcycle trails specifically. Conversely, public input regarding areas with "wilderness character" was not only considered, but brought into the planning process without question.	See general comment responses #19 , #20, #31,#145 and #147

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Utah Shared Access Alliance	OHV Route Identification	The Blue Ribbon Coalition understands and generally supports BLM's management guidance regarding OHV use limited to designated road, trails and "managed open areas". It is our strong desire to see BLM develop a sustainable OHV trail systems that provide a quality experience to the recreating public while minimizing environmental effects. It is very difficult to envision how BLM will be able to legally move from a document that does not contain one accurate OHV designation map for any action alternative to a Final Plan without giving the public the opportunity to view existing conditions, understand the rationale and criteria used to develop alternatives and be given enough accurate information to compare and contrast a range bf route designation alternatives.	See general comment responses #19 and #20 regarding OHV concerns and mapping. Also see general comment response #143 that deals with questions on the need to supplement the Draft RMP/EIS. Modifications to route designations will be considered on a case-by-case basis as activity level travel management plans are prepared.
Utah Shared Access Alliance	Process and Procedures	A significant percentage of BRC/USA-ALL's members and supporters visit and enjoy land managed by the PFO. It our strong desire to assist the agency in formulating management that provides for this use while protecting natural resources. Specifically, we wish to assist the PFO in developing enjoyable and sustainable recreational trail systems that meet the needs of the wide range of recreationists who visit this remarkable area. But we need to get there from here. Given the significant flaws in the DRMP/DEIS, there is a long way to go. It seems to us that the best route to take is to supplement the process with additional disclosure and analysis and opportunity for the recreating public to become meaningfully involved in the planning process.	Please see general comment responses #123 and #143
Utah Shared Access Alliance	Process and Procedures	BRC/USA-ALL strongly advises supplementing the existing DRMP/DEIS and believes one or more viable, if not superior, alternatives have been omitted from the process.	Please see general comment responses #2 and #143
Utah Shared Access Alliance	Process and Procedures	B: SPECIFIC COMMENTS REGARDING FLAWS IN THE DRMP/DEIS The DRMP/DEIS insufficiently and inaccurately describes the purpose and need to amend RMP. Obviously, the BLM must go beyond the statutory requirement to amend the plan when describing the purpose and need. BLM is required to define specific areas where management needs to be changed. Chapter 1 should clearly describe why different type of management is needed. Example: In section 1.2.2, under "Need", BLM states: Changes in recreation users and types of recreational opportunities have resulted in conflicts and resource concerns that the old plans were not designed to address. A reader may reasonably ask; what are the changes in recreation users and types of recreational opportunities and how have these changes resulted in conflicts? What is it about the old plans that limited their ability to address these changes? The next sentence does not suffice as an answer: These uses need to be addressed in terms of how they affect local communities, regional and state interests, and ecosystem health. Changes in user types and recreational opportunities do not translate to "uses" without adequate explanation. This sentence only raises additional questions; how do these uses (or changes) affect local communities, regional and state interests? What are the impacts to ecosystem health that require change in management?	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various resources and uses would change to meet the needs for the plan revision. Also see general comment response #142.
Utah Shared Access Alliance	Process and Procedures	What are the new technologies and what are the changes in type and level of impacts to various resources? The agency needs to be more specific. The changes in technology we are aware of have reduced impacts of oil and gas development (horizontal drilling, for example). So why do the changes between the old land use plan and all of the action alternatives in the DRMPIDEIS include substantial restrictions on oil and gas development? Frankly, we're confused. What is it that necessitates the need for the change? This problem is especially pronounced when addressing recreational uses. At a time when recreation on public lands is increasing and becoming increasingly important to the American public, BLM has proposed significant reductions in use levels in virtually every action alternative. But the document fails to tell us why. The document contains no nexus between the current condition and the management in each action Alternative. Chapter 1 is the proper place to inform the general public about changes taken place and why the old land use plans are inadequate. Chapter 1 fails to adequately or accurately support the need for change as well as support the range of alternatives. Chapter 1	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various

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		must be supplemented with information that accurately describes the need for change in such a way that the general public and decision makers can reasonably discern how each Alternative addresses each need and how each Alternative responds to the issues.	resources and uses would change to meet the needs for the plan revision. Also see general comment response #142.
Utah Shared Access Alliance	Process and Procedures	The critical flaw in the DRMP/DEIS is that it is written so that the public and decision makers simply cannot determine what LUA's BLM has identified. This is a basic and critical mandate placed upon the agency and cannot be ignored. BLM has failed to clearly and concisely describe management Objectives and desired future condition. The document fails to describe how allocation "tools" meet the management Objectives. The public is presented with a hodge-podge of overlapping and confusing management layers each with its own impacts to recreation. The reader cannot determine what management proscriptions apply to their choice of recreational activity at any given place, let alone the rationale BLM is using for the various management restrictions. Example: Chapter 2 describes management restrictions pursuant to the goals and objectives in the San Rafael Swell SRMA and then indicates an activity plan will be completed. Overlapping the SRMA is a "High Use Area" with yet another activity level plan associated with it. Within the SRMA and adjacent to the High Use Area is an ACEC, complete with its own management restrictions. Overlapping all of this are group size and vehicle restrictions contained in ROS classes.	Chapter 2 describes each of the alternatives analyzed in detail. Please see general comment response #37
Utah Shared Access Alliance	Process and Procedures	Land use plan decisions for public lands fall into two categories: desired outcomes (goals, standards, and objectives), and allowable uses and actions to achieve desired outcomes. Goals are generally broad statements of desired outcomes (e.g., maintain ecosystem health and productivity, promote community stability, ensure sustainable development). They are usually not quantifiable. Objectives identify specific desired conditions for resources. Objectives have established time frames, as appropriate, for achievement and are usually quantifiable and measurable (e.g., manage vegetative communities on the upland portion of the Clear Creek watershed to achieve by 2020, an average 30 to 40 percent canopy cover of sagebrush to sustain sagebrush-obligate species). The Goals and Objectives in the DRMP/DEIS for the various categories of resources, resource uses, special designations, and support are described in Sections 2.2. through 2.5, respectively (2.1.2 Goals and Objectives DRMPIDEIS pp 2-2 through 2-6). None of these "Goals and Objectives" can be remotely described as specific. None contain time frames for achievement or do they included quantifiable measurements. This is no small matter. It cannot be lawfully remedied by changed section 2.1.2 from "Goals and Objectives" to read simply "Goals". Yet, it seems the DRMP/DEIS treats "management objectives" as Goals.	The goals and objectives have been revised for the Proposed RMP/Final EIS to better explain the objectives and desired outcomes for each of the alternatives analyzed in detail. The level of detail suggested in the comment is not appropriate for the planning level of decisionmaking, but can be incorporated as the plan level decisions are implemented.
Utah Shared Access Alliance	Process and Procedures	Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain very similar, highly restrictive management prescriptions. Through the use of overlapping and confusing management "layers" BLM will attempt to require the public to comply with similarly confusing layers of restrictions, permits and fees. Aside from a slight difference in group size limits and slight change in SRMA boundaries there are very few differences in the action alternatives. As an example of the similarities, we note that there is no alternative with group size limits that aren't tied to the ROS class.	Please see general comment responses #2,#37 and #81
Utah Shared Access Alliance	Process and Procedures	The DRMP/DEIS provides inadequate information on its proposed management. In many cases, such as the highly restrictive group size limits proposed in all of the action Alternatives, the proposed management is not supported by any reasonable rationale. There legal requirement as well as a critical need to clearly articulate the desired future condition, frame the issues, describe resources and impacts to be addressed and disclose the criteria for the development of the Alternatives. The DRMP/DEIS does none of this. The public should be able to clearly understand why specific management has been proposed in accordance with each alternative based upon desired future conditions and changes in existing resource conditions. The document fails to provide the requisite	See general comment response #81. The text of the proposed RMP with respect to the requirement for organized group SRPs has been changed. All organized groups of more than 14/24, within a WSA/ in the remainder of the PFO (respectively) would be required to contact the BLM. Contact by an organized group and BLM's determination that a

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		analysis necessary to justify resource management proposals and in particular, restrictive management proposals that differ from current management.	permit is not required would be documented in a Letter of Agreement. Criteria the BLM will use to determine if such groups need an SRP provided in Appendix J of the Proposed RMP/Final EIS. Control of group sizes is needed for a variety of reasons including control of resource damage and ensuring a type of recreational experience. The objectives of each of the alternatives are described in section 2.3 of the Proposed RMP/Final EIS.
Utah Shared Access Alliance	Process and Procedures	Public input was not appropriately considered In our opinion, the document is fundamentally flawed in several key components. Primarily as result of BLM's deliberate efforts to withhold and delay meaningful public involvement mandated by law. BLM ignored data and delayed analysis in a manner that resulted in a pre-determined outcome. Public input regarding the accuracy of BLM's baseline route inventory data was never considered in a meaningful manner. The deliberate withholding and delay of public input resulted in the arbitrary closure of many valuable routes and in fact, entire trail systems.	Please see general comment responses #142 and #145
Utah Shared Access Alliance	Process and Procedures	RE: Section 1.3 (page 1-2), "Description of the Resources and Study Area" is inadequate and must be revised. The DRMP/DEIS contains much to be disappointed in, from our perspective. This section stands out. One would think that with all the flowery descriptions of the PFO the BLM has released in various news releases, publications, websites etc., the planning team would come up with something better than this. Suggestion: A voluminous description is not necessary, but BLM should at least attempt to describe for the general public what resources exist within the PFO.	Section 1.3 in the Draft RMP/Final EIS is intended to be a brief overview rather than a detailed description. A detailed description of resources in the planning are is contained in Chapter 3, Affected Environment. In order to avoid confusion, the title of the section has been shortened to "Description of the Planning Area" which is section 1.3 in the Proposed RMP/Final EIS.
Utah Shared Access Alliance	Process and Procedures	Comment on analysis (Chapter 4) The analysis in Chapter 4 should provide the nexus between on the ground condition, current management and alternative chosen. The analysis should be supported by evidence. The DRMP/DEIS fails to provide analysis that will provide context and describe impacts in sufficient; detail for public and decision makers to reach conclusions about the alternatives. The analysis of the impacts in the document fails to be compared and contrasted to analysis of the environmental effects of natural events including floods, wildfires, drought etc. Environmental analysis must not be pre-occupied with documenting what can be presently observed on the ground (at various points in time) while ignoring the legally relevant issue of whether on-the-ground conditions constitute significant impacts to the human environment.	Please see general comment response #123
Utah Shared Access Alliance	Process and Procedures	The document reflects BLMs inadequate and fatally flawed scoping shortcuts, incorrectly asserting that the presented alternatives were "developed through the public participation process..." and glossing over the details of the EIS scoping process. As a result of this deficient process the DRMP/DEIS is fatally flawed.	Please see general comment responses #125, #142 and #145
Utah Shared Access Alliance	Recreation	BLM may use a variety of "tools" to make recreational use allocations. Many, if not all are use in the DRMP/DEIS. For example, Recreation Opportunity Spectrum (ROS), Special Recreation Management Area (SRMA), OHV designations, etc. The DRMP/DEIS does not make effectively use of these `tools', however. The DRMP/DEIS does not adequately define or describe the desired future condition. The ROS inventory is flawed, out of date and conflicts with existing recreation management. The SRMA management goals and objectives aren't well defined and activity plans have not been prepared. Additional `designations' such as "High Use Areas" and ACEC's overlap and provide different and sometimes inconsistent management. In the Preferred Alternative, each of	Please see general comment response #50

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		these additional `designations' also appear to require separate activity plans. BRC/USA-ALL believes that if the agency wishes to push ahead to a Final Plan without additional analysis the Final Plan must clearly define the Goals and Objectives that address issues raised in the scoping process. These recommendations attempt to do that.	
Utah Shared Access Alliance	Recreation	RE: Group Size Limits and Special Recreation Permits Utah's families are notably larger than most. It's not unusual to find family gatherings including 50 persons or larger. It is most important that land use plans do not unnecessarily or arbitrarily limit recreational use by family groups. This is most important in the PFO, where "Easterin" is a firmly established socio-economic phenomenon.	Please see general comment response #81
Utah Shared Access Alliance	Recreation	BRC/USA-ALL objects to the manner in which large groups are limited to "Large Group Areas". We implore the planning team to visit these areas and ask if they have the same features as areas that are currently used by large groups (i.e. Head of Sinbad campsites). The large group area recently designated pursuant to the Temple Mountain - Southern Reef Recreation Site Development project (EA UT-070-2003-02) is way too small for the level of use it currently receives. This will present numerous management problems and will result in displacement of existing use into other areas not yet impacted. Limiting large groups to these few areas will unfairly and negatively impact organized OHV groups. The same is true for the group size restrictions outlined in the San Rafael SRMA in the action Alternatives.	Please see general comment response #81
Utah Shared Access Alliance	Recreation	BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Recommendations: Group size limits should not be specific to ROS determinations as is specified in all action alternatives. The PFO is encouraged to develop a simpler, easier to comply with group size limit policy that will be consistent across SRMAs and other management areas. A single group size limit for the entire PFO is recommended. Special Use Permit regulations and implementation of those regulations must be clarified in the Final Plan so that an average Utah family does not have to secure a permit, obtain insurance or pay a fee for simple family outings. The Special Recreation Permit process must be implemented in such a way that a quick visit to BLMs website will enable people to determine if a permit is necessary, what the fees will be and what the stipulations will be required. The process outlined in the DRMPIDEIS (appendix 14) is extremely confusing and puts the onus on the recreating public to determine if their activity will have a low, moderate or high impact on resources such as soils, vegetation and "environmental effects"(?).	Please see general comment response #81
Utah Shared Access Alliance	Recreation	The definition of Dispersed Camping should be clearly and concisely described in the plan. From review of the Pre Plan, the AMS and the Scoping Report, the fallowing issues surrounding Dispersed Camping should be addressed in the Final Plan: Human waste, trash, proliferation of both campsites and fire rings, OHV/Equestrian Staging areas and "Social Trails", impacts to archeological sites, impacts to vegetation, camping activities occurring in "inappropriate areas", impacts to wildlife and wildlife habitat	Please see general comment response #93
Utah Shared Access Alliance	Recreation	Education: Education is an important part of any public land management issue and must be incorporated into Dispersed Camping management. Public Information: Information is similar to, but not the same as education. There is a need to provide information on a) where Dispersed Camping is encouraged; and b) specific rules for specific areas (i.e. no firewood cutting, seasonal restrictions on campfires, porta-potty requirements etc.)	Please see general comment response #93
Utah Shared Access Alliance	Recreation	Use Pattern Information: Managing camping requires a fairly complete understanding of who, what, when and where. Often, land managers lack this information. The Final Plan should identify inventory and use pattern information needs and set objectives for meeting those needs. Campsite analysis: This is also important for Dispersed Camping management. This is best described as being a judgment of "risk v. value" or "opportunity v.	See general comment response #93. Final decisions on dispersed camping will be considered as implementation decisions.

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		trade-off" for each campsite.	
Utah Shared Access Alliance	Recreation	Mitigation: Many problems associated with Dispersed Camping can be resolved with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access "routes") • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing "impacted areas" and limiting use to those areas. (Identifying currently used sites and `marking' them by permanent fire rings or signage) • Appropriate buffer from streams and lakes. (Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation) • Archeological clearance • Sustainable signing. (If possible, all signing should be literally bullet proof)	Please see general comment response #93
Utah Shared Access Alliance	Recreation	The Final Plan should include the following Goals and Objectives for Dispersed Camping: Goal: Manage Dispersed Camping use on public lands and National Forests in such a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall forest and rangeland health, vegetation and wildlife. Objectives: • Identify and map roads and trails that tie to adjacent communities where food, lodging, fuel and other goods and services may be found. This should be accomplished during OHV route designation process. • Identify areas where local communities may post information regarding where goods and services are available in adjacent communities. This should be accomplished during the OHV route implementation process. • The Special Recreation Permit application process should be made as streamlined as possible so that large groups may be able to camp in appropriate areas. Annual review is suggested for modification of permitting process. • BLM will pursue partnerships and grants for developing logical Dispersed Camping management to help mitigate budget constraints. • Where compatible with reasonable conservation measures, access to campsites will be maintained in areas offering the opportunity to see wildlife and view scenic vistas. This should be accomplished during the OHV Route Designation Process. • Dispersed Campsites and Dispersed Camping areas shall be located to minimize significant damage to soil, watershed, vegetation, wildlife or other resources • Dispersed Campsites and Dispersed Camping areas shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of Dispersed Camping opportunities that fulfill the experience desired by family outings. Objectives: • Travel maps will identify Dispersed Campsites and Dispersed Camping areas that can used by families and/or large groups. This should be accomplished in the OHV route implementation process • Spur routes will be designated for motorized access to Dispersed Campsites and other destinations such as scenic overlooks, viewing historic and cultural resources etc. This should be accomplished during the OHV Route Designation process. Goal: Actively manage Dispersed Camping in order to ensure an extensive opportunity that satisfies the experience desired by a wide range of recreationists while minimizing impacts. Objectives: • Develop best practice models for campsite maintenance, management and development. • An complete and accurate inventory of existing campsites will be completed to support sustained management • Standardized signing on the ground will be implemented throughout land management designations i.e. SRMA, ERMA, ACEC etc. • Maps will be easily available and contain standardized information proper camping etiquette and certain site specific restrictions • Partnerships will be developed with user groups to enhance education, safety, ethics, user sharing, conservation and compliance • Campsites, when closed, will be signed with an official, legitimate reason. Monitoring should be implemented to justify the reasons stated. • Emphasis should first be given to maintenance, reconstruction, and relocation of existing campsites before closures are considered. • Proper education programs and service programs must be an important focus of all recreation management. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so	Please see general comment response #93

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		they utilize the lands suitable for their mode of recreation. Goal: Minimize impacts and conflicts from Dispersed Camping associated with OHV use by mitigation efforts as well as maximizing the dispersal of OHV staging areas and providing intensive OHV staging areas where it makes sense on the ground. Objectives: • BLM will identify and designate OHV staging areas and trails or "tot lots" for youth activities. This will be accomplished during the route designation process • BLM will clearly delineate access to campsites to reduce proliferation of "social trails". This will be accomplished during implementation of the route designation process Goal: Enhance public land visitor accountability and responsibility so impacts to resources are minimized, campsites remain clean and fire rings do not proliferate. Objectives: • BLM will provide educational and informational materials for distribution to visitors. Information should be available at Kiosks and where major roads provide access to public lands • BLM will attempt to educate recreationists on the potential resource impacts and user responsibilities when engaged in Dispersed Camping use through partnerships with user groups, other agencies and the formal education system. Goal: Attain resource sustainability goals by using mitigation instead of closure. Objectives: • Develop best practice models for campsite maintenance, management and development. • Resolve problems associated with Dispersed Camping with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access "routes") • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing "impacted areas" and limiting use to those areas. (Identifying currently used sites and `marking' them by permanent fire rings or signage) • Applying appropriate buffer from streams and lakes. Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation. • Archeological clearance • Sustainable signing.	
Utah Shared Access Alliance	Recreation	All too often, recreationists must resort to creating valuable recreational experiences by themselves, with no guidance, input or assistance from land managers. Routes originally constructed for mineral location and development and livestock grazing have been connected and are now used for recreational purposes. Land managers have created little in the way of recreational opportunity. BLM should consider proliferation of new, unplanned roads and trails as signs of the recreation staff not keeping up with demand. The BLM must think, "recreational infrastructure planning", not "travel management". Think in terms of providing recreational experience, not in terms of punishing the public for searching for such experience.	The alternatives, including the Proposed RMP, would designate routes as closed or open for motorized use. The routes would be mapped and signed, and closure of routes would be enforced on the ground (See Maps 2-71 through 2-74 of the Proposed RMP/Final EIS for route designations). The BLM, with assistance of it's cooperators has evaluated routes against a standard set of criteria to consider resource impacts, safety considerations, landscape settings and recreational opportunities. These criteria include cultural resources, watershed, special status species, wildlife, and other uses. The Proposed RMP does not contemplate designating all existing routes. The route designation process started from a baseline of known existing routes, identified the routes that would best serve the motorized recreating public, factoring in conflicts with non-motorized uses when known. A multiple use travel plan that would include designating hiking or horse routes is not part of this phase of planning but will be done later as an

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			activity plan.
Utah Shared Access Alliance	Recreation	Another example is how ROS is treated totally inconsistently in various SRMA's. In all SRMA's except the San Rafael, SPNM classes are closed to vehicle use. In the San Rafael SRMA, the document is silent on any vehicle restrictions related to ROS. What is the public to think?	See general comment response #50. ROS SPNM was a criteria used in the San Rafael Motorized Route Designation Plan (SRMRDP) of February, 2003. The SRMRDP would be carried forward without modification in all alternatives except Alternative E. The criteria developed in the SRMRDP have been applied to the remainder of the Price Field Office (PFO).
Utah Shared Access Alliance	Recreation	The DRMP/DEIS makes so many site specific decisions regarding recreation management that future management options are precluded.	Please see general comment response #93
Utah Shared Access Alliance	Recreation	The ROS inventory is flawed. Many SPNM classes are in areas that receive substantial OHV recreational use. In several cases, designated OHV routes pass through the SPNM class.	Please see general comment response #50
Utah Shared Access Alliance	Recreation	RE: Section 2.8.3 "Recreation" BLM describes actions common to all Alternatives. The second bullet point reads: Where long-term damage by recreational uses is observed or anticipated, limit or control activities through specialized management tools such as designated campsites, permits, area closures, and limitations on number of users and duration of use. Revise recreation management plans and management framework plans when they prove to be either overly restrictive or inadequate to maintain public land health. BRC/USA-ALL strongly objects to this and recommends its revision. The term "long-term damage" is not defined. Implementing management actions on the anticipation that "long-term" damage may occur is inappropriate. BRC/USA-ALL recommends this "bullet" be revised with the following: Recreational activities should be managed to minimize damage to soil, watershed, vegetation, air, or other resources.	Please see general comment response #92
Utah Shared Access Alliance	Recreation	RE: Section 2.8.3 "Recreation" BLM describes actions common to all Alternatives. The fourteenth bullet point reads: Campgrounds and dispersed camping areas in SRMAs could be closed seasonally or as impacts or environmental conditions warrant. Incorporating this into the RMP is redundant and unnecessary. BLM has all the necessary tools to seasonally adjust use "as conditions warrant". Incorporating this section into the RMP will lead to unnecessary and arbitrary closures. Suggestion: BRC/USA-ALL recommends the removal of this "bullet".	The discussion regarding closing campgrounds and dispersed camping areas seasonally or as impacts warrant, is specific to SRMA management and is not meant to be redundant of BLM's general authority.
Utah Shared Access Alliance	Recreation	Trend and condition analysis is meaningless without comparison of baseline condition/degree of change and establishment of the "significance threshold". BRC/USAALL recommends revision of the "Significance Criteria" in the document. Better significant criteria would be indicators that can be quantified by a unit of measure. For example: number of campsites open vs closed, number of miles of routes open vs closed. Or miles of routes available for OHV recreation. Or number of loops available. Number of visitor days lost due to management actions etc. The BLM needs to identify the impacts -- then -- quantify and qualify significance. Establish such thresholds on which significance can be judged (or determined). When formulating analysis BLM must ask: does analysis give enough information to make that determination? Is it possible to make comparisons against the baseline data?	Please see general comment response #92
Utah Shared Access Alliance	Socioeconomics	The DRMP/DEIS must include disclosure and analysis of income and employment for various economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns, including motorized recreational activities. The DRMP/DEIS fails to effectively address the full realm of positive economic benefits associated with current and future recreational uses. BLM has failed to incorporate economic impacts into the decision making process and alternative formation. Despite what BLM may claim, there is no alternative that	See general comment responses #132 and #133

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		maximizes economic benefits.	
Utah Shared Access Alliance	Soil, Water and Riparian	RE: Soil, Water, and Riparian Resources Under Establishment of Buffer Zones for No Surface Disturbance around Riparian-Wetland Habitats within Alternative C, new surface disturbance would be prohibited within the 100-year floodplain or within 100 meters on either side of the centerline along all perennial and intermittent streams. We strongly object to the application of this decision to intermittent streams. An intermittent stream in Utah can sometimes consist of a drainage that carries storm water only once per year. Suggestion: BLM should eliminate the provision for intermittent streams.	Please see general comment response #70
Utah Shared Access Alliance	Transportation and Access	The DRMP/DEIS contains a fatal inconsistency that must be corrected. Although the DRMP/DEIS purports to recognize valid existing rights, it goes out of its way to ignore critical rights of access. The BLM simply cannot have it both ways. On one hand, BLM says one of their key planning criteria is to recognize all valid existing rights, on the other hand BLM says RS 2477 rights-of-ways will not be considered. On one hand, BLM says RS 2477 rights-of-way assertions will be "settled as determined by the Administration.", on the other hand BLM purports to close asserted RS 2477 rights-of-way and threaten fines and imprisonment to any American who chooses to use a vehicle on these roads. The BLM cannot assume that it has authority or discretion to close or to assume jurisdiction over public roads, which by law are controlled by local government. Such an assumption on the Bureau's part is without observance of procedure required by law; and would have to be considered by even the most casual observer as arbitrary, capricious, and an unwarranted attempt to usurp local governments' authority and rights. Utah's RS 2477 rights-of-ways are public assets held in trust by the county and the state. The development of alternatives or any planning activity that would result in the signing of RS 2477 assertions as closed would result in significant harm to many public land visitors especially our members and supporters. Public roads, ways, trails, etc. can only be closed in accordance with State law, which requires a public process, generally carried out by local government BLM cannot take away, and is specifically required and mandated by law to protect valid existing rights in its planning and management of the public lands. There is well-established law that a county or other governmental entity does not need to assert "claims" nor does the BLM need to recognize, a right-of-way, in order for the county to exercise its rights. The BLM must recognize that much of the public access and transportation infrastructure which provides access to public lands in the West is an integral part of the history, the culture, and the socio-economic fabric of the area. These roads are, in fact, a resource and part of the physical infrastructure of counties and local governments and should be recognized as such. Regardless of pending litigation or negotiations over RS 2477 assertions, must find a way of dealing with this issue that is consistent, or at least not inconsistent, with applicable law and which does not force the counties or other public land users into adversarial positions and expensive litigation. BRC/USA-ALL recommends BLM use the RMP process to address asserted rights-of-ways. Where BLM and the state and counties disagree, specific rights-of-ways should be adjudicated.	Please see general comment responses #11, #39, and #110
Utah Shared Access Alliance	Wildlife and Fish	RE: Appendix 8 includes a seasonal restriction of April 15 through August 1 in high-value breeding habitats for neotropical migratory birds. Nice try. According to the Utah Division of Wildlife Resources website, the entire PFO is either critical value or high value habitat for neotropical migratory birds. As such, every square inch in the PFO could be designated as high-value breeding habitat.	Please see general comment responses #8 and #42
Wasatch Mountain Club	OHV Route Identification	The Wasatch Mountain Club is submitting this transportation plan for consideration by the BLM in making decisions regarding designation of routes for use by off-road vehicles (ORVs). The plan consists of a map of the San Rafael which shows hiking trails (red), biking trails (green), canoe/kayak streams (blue), and canyoneering slot canyons (black)... In order to accommodate multiple use of these public lands, BLM should provide opportunities for quiet recreation, including closing areas to ORV use and converting motorized trails to non-	The route designation process was started from a baseline of known existing routes. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts

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		motorized uses. Non-motorized recreation areas are needed to minimize conflicts among multiple users and avoid interference with and damage to the other resources enjoyed as part of recreation... Resource conflicts emerge because ORVs have direct and negative impacts on the resources that draw people to Utah's wildlands: wildlife, vegetation, riparian areas, clean air and water, and beautiful scenery... These areas are simply not suitable for ORV use and should be closed to motorized vehicles. Since many quiet users value public lands for their intact ecosystems and natural character, precluding motorized use in some areas also demonstrates BLM's respect for this land-use value. Similarly, designating areas for non-motorized recreation serves to minimize resource-use conflicts between ORVs and non-motorized recreation... There are three areas in the San Rafael Swell where major conflict occurs between motorized and non-motorized uses. The Crack Canyon WSA has many hiking and canyoneering opportunities. Many are linked by hiking across the face of the reef, or hiking between them on the north side of the reef. The north side connection brings hikers into contact with motorized users on the Behind the Reef route. The southern end of the Sid's Mountain WSA has many hiking and biking routes in and around the South and North Forks of Coal Wash. Several of these hiking trails are open to vehicle use through the WSA. Lastly, the area west of the San Rafael Reef brings single track vehicular use in contact with hiking and biking. Behind the Reef, Coal Washes, and the Iron Wash single track motorized routes should be converted to non-motorized uses to best fulfill BLM's obligation to balance multiple uses	between motorized and non-motorized uses. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. As stated in Table 2-15, BLM will address use of non-motorized and motorized recreational trails in activity level plans. These plans will address use of trails for OHVs, hiking, equestrian use and bicycles. Also see general comment responses #15, #19 and #20.
West Ridge Resources, Inc.	Paleontology	Protecting paleontological resources from surface-disturbing impacts. Fossils come in all shapes and sizes from T. Rex bones down to near-microscopic shells of ancient primitive sea dwellers. Prior to implementing this plan the BLM should be required to clearly define what it considers to be a "fossil resource" worthy of protection from surface disturbance so that future decisions are based on accepted guide-lines and criteria. These guidelines and criteria should be published and be subject to public review, comment and appeal.	BLM Handbook 8270-1 (General Procedural Guidance For Paleontological Resource Management), first issued in July 1998, clearly defines and sets out guidelines for the protection of fossil resources. They have been published, made available for public review, comment, and appeal. Fossil resources that the BLM is required by law to protect include vertebrate fossils and significant invertebrate and plant fossils.
West Ridge Resources, Inc.	Soil, Water and Riparian	1) A 660' buffer zone of no disturbance or occupancy would be maintained around natural springs. In practice, this restriction cannot be implemented until the term "spring" is first defined. Any seep can be defined as a spring, and any damp area with distinctive soil or vegetation can be termed a seep. Hence, the definition of a spring becomes quite subjective and arbitrary. In reality, under this restriction, any disturbance or occupancy within 660' of a damp spot could be precluded. The plan needs to provide a clearer definition of "spring", and should allow for greater flexibility in protecting the resource without imposing a prohibition of disturbance/occupancy within an iron-clad buffer-zone. Before this plan is implemented BLM should first be required to prepare a map showing specifically which springs/seeps would be affected by this restriction, with the understanding that all other areas not included in the mapped inventory would not be subject to this restriction in the future. This inventory should be subject to public review, comment and appeal prior to implementation. 2) Allow no new surface disturbance within 100-year flood plains or within 330' or riparian areas. As with the previous comment, this requirement is vague and subject to arbitrary and subjective interpretation in the future. This restriction is ostensibly designed to protect riparian-wetland habitat, but then includes perennial streams within the scope of resource protection. State and federal agencies are continually changing their definition of riparian areas, perennial streams and flood plains. It is constantly moving target. Again, before this plan is implemented BLM should first be required to identify and map those specific areas that would be subject to this restriction, with the understanding that all other areas not included in this inventory would not be subject to this restriction in the future. This inventory should be subject to	See general comment responses #68, #70 and #74. Chapter 4 analyzes the potential impacts of soils, water and riparian decisions on all other resources.

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		public review, comment and appeal prior to implementation.	
West Ridge Resources, Inc.	Special Status Species	5. Prohibit surface disturbance in areas of special-status plant or animal species. Protection of Threatened and Endangered species has now morphed into protection of threatened species, endangered species, sensitive species, candidate species, high interest species, special-status species, habitat for all of the above and potential habitat for all of the above. With so many state and federal agencies involved and so many different listings involved, it is confusing for the public to understand.	Please see general comment response #7
West Ridge Resources, Inc.	Transportation and Access	6) Transmission and utility rights-of-way require RMP amendment. Under the proposed plan construction of any new paved road or 69 KV power line would require an amendment to the RMP. This is apparently above and beyond the existing comprehensive NEPA compliance requirements. The requirement to amend the RMP, in addition to completing all the NEPA requirements, seems to be an unreasonable burden to place on a project proponent. Under this scenario a valid right-of-way project, while in full compliance with NEPA and all other environmental laws, could be killed simply because BLM determined it did not have adequate resources to amend the RMP in a timely manner. The proposed RMP should clearly define up-front which areas within the PFO district are off-limits in the future to new paved roads and 69 KV powerlines, with the understanding that right-of way projects in the remaining areas would be subject to NEPA compliance and the currently approved RMP.	The comment mis-interprets the language of Draft and Proposed RMPs. The wording is "Any new utility corridors would require a plan amendment." Therefore, designation of new corridors would require a plan amendment, but issuance of a right-of-way in designated corridors would not require a plan amendment.
West Ridge Resources, Inc.	Visual Resources	4) Require all resource uses to meet Visual Resource Management (VRM) objectives. The VRM management system proposed by the BLM is not specific enough. It is vague and impossible to interpret. For example, in VRM Class 3 areas, which include much of the area administered by the Price Field Office, modifications to the landscape "should not dominate the view of the casual observer" and "may not dominate the landscape". Such nebulous language, when adopted into BLM's official management plan, would be sufficient to provide the legal basis to protest the construction of any new power-line, road, building, or structure of any kind. Prior to implementing this plan the BLM should publish a detailed list of exactly what activities would be specifically allowed and specifically not allowed within the various VRM classes. This list should be subject to public review, comment and appeal.	Please see general comment response #135
Western Slope ATV Association	OHV Route Identification	First, we have heard that you intend to set group size limits for recreationists that in the past would not have to obtain a SRP. In other words, Clubs like ours would not be able to have a group outing without first applying for a SRP. We feel this is a big mistake because it directly affects partners that have worked with you in promoting responsible use and repairing resource damage.	Please see general comment response #81
Western Slope ATV Association	OHV Route Identification	The second error is the closing of more roads in the San Rafael Management Area in particular. To funnel a rapidly growing user group onto shrinking numbers of roads will not only add to the resource damage by it is irresponsible. It will promote illegal use and trespassing and will encourage users to break the law in order to recreate.	Please see general comment response #19
Westport Oil & Gas	Minerals and Energy Resources	In light of the increasing concerns for US energy domestic supplies, multiple use under the RMP should insure those oil & gas productive areas are managed for the benefit of the energy consuming public. Additionally, the energy industry provides for the economic well being of the rural communities in the eastern portion of the State. Many of these towns are extremely dependent on access to and the use of public lands.	Please see general comment response #18
White Mountain Open Trails Assoc	OHV Route Identification	The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans; however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use. Various layers of management make it almost impossible to understand the travel rules for lands in each	Please see general comment responses #19, #20 and #31

Organization	Category	Comment	Response
		SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. Apparently, changes to the San Rafael are proposed; however, it is not clear from reading the DRMP/DEIS what changes will be made. The BLM must correct this error and tell the public how each alternative will alter the San Rafael travel Plan. We oppose any additional road and trail closures in the San Rafael Route Designation Planning Area.	
White Mountain Open Trails Assoc	OHV Route Identification	BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid size non-profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. We recommend BLM stay with the proven 50 vehicle group size limit.	Please see general comment response #81
White Mountain Open Trails Assoc	OHV Route Identification	We are interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. These trails do not appear on any of the Maps in the Appendix and it is not clear whether or not the BLM intends to close these popular OHV trail systems Please clarify this important issue and make note of our strong encouragement to keep these valuable recreational resources open for use for motorized recreation.	Please see general comment responses #20 and #31
White Mountain Open Trails Assoc	Recreation	Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. We see no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. Our club does not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation.	Please see general comment response #81
XTO Energy	Minerals and Energy Resources	We believe that, if implemented, Alternative D will serve to severely limit development throughout the planning area due to highly restrictive and unjustified land use allocations. Nine Mile Canyon and Range Creek have been proposed as no surface occupancy and no lease Areas of Critical Environmental Concern (ACEC) respectively. These restrictions would be applied regardless of the fact that the majority of Nine Mile Canyon is privately held and under fee mineral leases that are jointly being developed with the federal leases. Similar NSO restrictions pose access and development difficulty to a three-mile portion of the Range Creek area outside the existing Turtle Canyon Wilderness Study Area. XTO questions the necessity to impose additional restrictions upon valid and existing leases where operators currently comply with existing laws protecting water, air, cultural and other resources.	The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities for OHV use and mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of OHV use and mineral development. Future leasing decisions do not apply to existing leases. Existing leases may be developed under the terms of the lease.
XTO Energy	Minerals and Energy Resources	The Preferred Alternative D severely and unduly hampers industry's ability to explore for and develop oil and gas resources throughout the planning area, and in particular those areas with demonstrated development potential. The Preferred Alternative must offer a more equitable approach to sincere land management, acknowledging the industry's conscientious ability to mitigate adverse impacts rather than closing or severely restricting access to resources valuable to the federal government, the state of Utah and this company. We believe that the Preferred Alternative must be revised to reduce restrictions associated with wildlife resources, eliminate the ACEC's for Nine Mile Canyon and Range Creek and limit its application of Visual Resource Management Class II to areas where no existing or future resource development activities are expected to occur.	Please see general comment response #18
XTO Energy	Minerals and Energy	The RFD projects an inadequate level of future development in the planning area of a mere 1540 wells over the	Please see general comment response #51

Organization	Category	Comment	Response
	Resources	next 15-20 years. The estimation ignores 6 USGS identified “play areas” that offer significant opportunities for resource development substantiated by recent industry interest, and sets a ceiling of wells that can be drilled, contradictive of Instruction Memorandum (IM) 2004-89. BLM should identify the least restrictive management options necessary to protect a resource value and conduct an analysis of the cumulative effects of the projected level of activity using baseline data for each alternative.	
XTO Energy	Minerals and Energy Resources	It is imperative that the BLM modify its management of wildlife with respect to oil and gas operations. We are extremely concerned that in Appendix 16 BLM does not allow the granting of exceptions or modifications to most seasonal restrictions despite when it is demonstrated that the species do not inhabit the area of concern. Rather than issuing blanket restrictive stipulations, BLM should commit to developing a reasonable program for applying and excepting or modifying a stipulation in cooperation with industry and other multiple resource users.	The inconsistencies related to Appendices 8 and 16 in the Draft RMP/EIS have been resolved and the two appendices have been combined to create Appendix G of the Proposed RMP/Final EIS. Also waiver, exception, and modification criteria have been added to each of the stipulations.
XTO Energy	Minerals and Energy Resources	We strongly object that the environmental consequences analyzed and discussed in the draft RMP do not consider routinely applied mitigation measures until after it has described the worst case scenario. It is crucial for mitigation measures to be acknowledged in the analysis to demonstrate that oil and gas activities are mitigated and are actually compatible with multiple resource uses, including those in sensitive areas. This analysis must be revised in order to incorporate mitigation measures in the cumulative effects and environmental consequences.	The impact analysis in the Proposed RMP/FEIS is based on implementation of stipulations and mitigation measures applicable to each of the alternatives analyzed in detail.
XTO Energy	Process and Procedures	XTO believes that the DEIS fails to set out a solid foundation for future land use decisions. It broadly imposes restrictive measures to limit the industry’s ability to access lands for environmentally responsible oil and gas leasing, exploration and development. The DEIS ignores the BLM’s 1601 planning manual requiring that land use planning be used as the key tool to protect and use resources and designate uses on public lands through the development of desired outcomes and actions. The DEIS merely identifies restrictions without any consideration of future activities. We believe that the plan must be revised to include proper future land use decisions to avoid unnecessary extensive and costly project level NEPA documentation.	Please see general comment response #2
XTO Energy	Process and Procedures	We specifically request the legal interpretation and justification for BLM to transfer management responsibilities to private parties. The RMP states “where it is found mutually advantageous, BLM would enter into cooperative agreements or memorandums of understanding with federal, state, local, tribal, and private entities to manage lands or programs consistent with the goals and objectives of this RMP.” We are unaware of any authority through which the BLM may relinquish its management responsibilities to non federal entities, particularly private ones.	The BLM may enter into cooperative agreements or memorandums of understanding with federal, state, local, tribal, and private entities to manage lands or programs consistent with the goals and objectives of this RMP according to the provisions in Section 307 of FLPMA."
XTO Energy	Socioeconomics	The RMP does not appear to consider the socio-economic aspect of future development in the planning process. The BLM does not fully address the full realm of the positive economic benefits associated with current and future oil and gas activities in the planning area, such as tax payments, lease rentals, bonus bids, and royalty payments (half of which are returned to the state). The BLM could have noted these beneficial impacts during the land use decision process and specifically in identifying alternatives included in the Preferred Alternative.	See general comment responses #2 and #132
'Zu Zoo, Inc.	OHV Route Identification	The proposed Resource Management Plan for the San Rafael Swell concerns me -- I permit an annual event in Moab and have been considering spreading out, as well. The RMP appears to restrict OHV and 4x4 use with little consideration given to the years of historic access, and newer techniques of minimizing resource impact.	Please see general comment response #19
'Zu Zoo, Inc.	OHV Route Identification	As an avid outdoorsman, I have spent many vacations in the Utah wilderness including many lands under BLM management. I plan to continue do so in the future with several OHV clubs I belong to. I am concerned that the new RMP appears to severely limit OHV to areas we are interested in visiting and enjoying. Existing, and long standing trails are likely to be closed to OHV use.	Please see general comment response #19

Organization	Category	Comment	Response
'Zu Zoo, Inc.	Transportation and Access	Please keep recreational access in mind when making a decision about this RMP. Public land should stay accessible to the public!	Please see general comment response #10

Individuals' Comments and Responses

First Name	Last Name	Category	Comment	Response
Karen	Achor	Minerals and Energy Resources	Please do NOT open any more land to oil & gas drilling.	Please see general comment response #18
Ann	Adams	OHV Route Identification	Designate specific ATV trails in the RMP, which minimize environmental and social impacts; decline to designate any open areas for unrestricted ORV use; and decline to designate trails for off-road vehicles on lands included within America's Redrock Wilderness Act - particularly in existing wilderness study areas like Sids Mountain.	Please see general comment response #12
KENT	ADAMS	Transportation and Access	I BELIEVE AS A TAX PAYER,THE PEOPLE SHOULD HAVE ACCESS ON EXISTING ROADWAYS ON BLM AND FORREST SERVICE AREAS.	Please see general comment response #10
Perry	Adams	OHV Route Identification	We enjoy riding in several areas on our 4-wheelers, with our family, and our brother's family, and our friends. We like to look at all the beautiful scenery that the trails have to offer. If there is no access to these areas, no one will be able to see these beautiful sceneries. We are planning more ridding trips in the near future. We hope to be able to keep coming here with our kids, and grand kids, so that they too can see the beautiful scenery. We have been to Swassy Cabin, Eagle canyon, Devils Race Track, and several areas that we can't remember the names of. A lot of the areas people would not be able to see, if they couldn't ride up by 4-Wheelers or ride their horse. They are difficult to hike in the hot summer weather. There are trails already that are closed that I will never have the opportunity to see, with my brother. It is a real shame.	Please see general comment response #19
Perry	Adams	Transportation and Access	I feel that every one is entitled to have access to this beautiful area, that's why it was put here. If people can't enjoy it, than it isn't any good to anyone. People using this areas should respect the surroundings, so that every one can enjoy it. We need to have a map, of the trails, so that people know where they can and cannot go. If there are roads, and trails, then they need to stay open, to the public.	The Final RMP/EIS and ROD will designate a network of routes for motorized use that will be mapped, signed, and enforced. A map of the routes will be published and displayed for public use. Trail marking and enforcement will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. The Proposed RMP would not designate all existing routes as open for use. The route designation process was started from a baseline of known existing routes. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses.

First Name	Last Name	Category	Comment	Response
Art	Addie	Transportation and Access	I am opposed to the current trend of closing off access to land. The open spaces in this country are there for the people to enjoy. If they are being preserved then they must be preserved for people to use. Your responsibility to protect the land is to protect it for the people not from the people.	Please see general comment response #10
David	Addison	Recreation	"3.3.3.6 Recreational Off-Highway Vehicle Use Growth of OHV use has become a significant issue in the PFO because of the concern related to the possible degradation of resources that can result from high levels of use and proliferation of pioneered routes." "Recreation activities may also conflict with and have an impact on other uses of the PFO. Specific examples of this type of conflict and impact include damage to cultural resources, disturbance of wildlife habitat, disruption of grazing activities, and damage to natural ecosystems." [DRAFT RMP/EIS 3-49]	Please see general comment response #15
Lori	Adkison	Minerals and Energy Resources	Rather than sacrifice these pristine lands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would cause.	Please see general comment response #18
Lori	Adkison	OHV Route Identification	I also urge you to protect these lands from further damage from off-road vehicle activity.	Please see general comment response #19
Eric	Adman	Wilderness	I am writing to tell you that I oppose the recommendations in the draft plan for the 2.5 million acres managed by the Price field office. I believe that too much emphasis is placed on oil and gas leasing and off-road vehicle use. Much of this land is of wilderness quality, and should be protected. Thank you for your consideration.	Please see general comment response #109
John and Susanne	Alcock	OHV Route Identification	It is important that the BLM designate specific trails in the RMP and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act -- and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment response #12
Will	Alexlinde	Minerals and Energy Resources	Opening virtually all of these lands to the destructive effects of oil and gas development and to the also destructive all-terrain vehicles would be counter to the Redrock Wilderness Act.	Please see general comment response #18
Wade	Allinson	OHV Route Identification	Land managers must realize that closure has nothing to do with management. Case in point, you can close a road, trail or campsite, and see people drive right by the signs. This happens because of the lack of insight. The San Rafael Travel plan touted last year clearly shows how you closed small spurs that you called roads when in fact these spurs led to campsites that have existed for years. All your staff could see was closing a road. They could not see beyond the road. They could not see that by closing these roads, campers were displaced and new impacts were created. Management is found in opportunity, interested staff, and in creating trail systems... To make things happen, you must have on staff in your office a recreation specialist that has interest, experience and a background in OHV management. All of the alternatives, in order to be affective must have staff that is enthusiastic about OHVs. Without it, you are swimming against the current. This is more than evident in your office... My biggest concern with the DRMP is that, the maps inventoried did not include any of the trails in the Chimney Rock/Summerville area. By not including any of these trails in any of the alternatives, this will in effect close all riding in this area. Keep in mind, this is an open OHV area. I don't expect you to keep this as an open area, but I	Please see general comment responses #19, #31, and #89

First Name	Last Name	Category	Comment	Response
			more than expected to have all of the trails submitted to be included in the system...step one can be fair. I have one concern. During the time it will take to establish a system in this area, the BLM will have created ACECs and ROS-NMs that will eliminate any trail systems in these areas. Sort of putting the card before the horse. So, to make things fair I am demanding that the entire trail inventory in the Price District remain open prior to any designation of ACECs or ROS-NMs. 4-487 mentioned that ACECs such as Seger's Hole will be limited to designated routes for OHV use to maintain opportunities for motorized recreation. There is not a single inch of road open in Seger's Hole. You closed this when the San Rafael Travel plan came out last year.	
Wade	Allinson	Recreation	I am also strongly against requiring a Special Recreation Permit (SRP) for non-commercial activities. This is a horrible management decision. This will do away with many of the traditional, non-commercial events and outings that have been part of our culture, here in Emery County for generations. If this is implemented, it could take months for your staff to issue a permit. I am also concerned that your staff will take advantage of this and take months to approve an application in a means to discourage activities that do not fit their agendas. If the BLM, in their wisdom must have SRPs then you must follow a recommended 72 hour application approval/denial period.	Please see general comment response #81
Wade	Allinson	Socioeconomics	In the DRMP I could not find any mention of economic input data. You are REQUIRED by FLPMA to state the economic factors, currently and any impact your decision could have on the future economic status of Carbon and Emery Counties.	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 socioeconomics 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. This discussion explains in detail how direct industries, such as energy production, generate additional income and employment for indirect industries (trucking, lodging, etc.).
Keith	Allred	Wilderness	These are totally unique places and along with another two or three million acres truly deserve wilderness protection.	Please see general comment response #109
Linda	Alsop	OHV Route	The protection of these areas should include the designation of trails that are clearly marked where ORV use is	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
		Identification	appropriate, so that the noise and scarring caused by ORV's doesn't affect other public lands. Your agency must develop and enforce practices that ensure the protection of these areas.	
Amy	Anderson	Minerals and Energy Resources	Keep Utah's vistas free from oil roads and gas lines.	Please see general comment response #18
Amy	Anderson	OHV Route Identification	Restrict off road vehicles from public lands, keeping them clearly designated areas.	Please see general comment response #19
Gayle	Anderson	OHV Route Identification	Fully analyze each proposed motorized route to ensure that environmental and social impacts are minimized. Please do not designate any "open areas" where ORV use is allowed without limitation. Do not designate ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12, #36 and #132
Gayle	Anderson	Wilderness	Protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #111
Milan	Anderson	Transportation and Access	The last time I visited the San Rafael swell I was appalled by all of the areas that were now off limits to the public. This included all motorized vehicles and even bicycles! How can you use the land without any access to it? The SUWA organization and their comrades are trying to tie up and withdraw all the land for themselves. Why should a very small minority wield so much political power? The land belongs to all of the citizens of the United States of America.	Please see general comment response #10
Sheryl	Anderson	Minerals and Energy Resources	It alarms me to read of increased interests in oil and gas developments in the prime wilderness areas of Utah.	Please see general comment response #101
Catherine	Andrulis	OHV Route Identification	Designating every inventoried trail as a motorized route is an irresponsible and unacceptable approach to dealing with motorized recreation. The BLM needs to complete a comprehensive route designation plan that considers non-motorized users of public land, protecting sensitive areas that will be ruined by continued ORV use. The proposed plan fails to provide a balance between motorized and non-motorized recreation. If the agency continues down that path, 99.5% of land in the Price BLM district will be within 3 miles of a route.	Please see general comment response #19
Ron	Apfelbaum	Transportation and Access	I am writing to comment on the Price Field Office's Resource Management Plan. As a private pilot and outdoor recreation enthusiast, I appreciate the fact that the BLM staff has included continued use of the airstrips at Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat/Peter's Point in the first draft of the new RMP. I have had the opportunity to visit all four of these strips in recent months and greatly appreciate the access they provide to areas that are fascinating and wonderful to visit, explore, and camp in. These and a number of other airstrips within the RMP provide access to me and my family that quite honestly I could not acquire in any other way. As I age, my strength and endurance has been reduced, and this past year significant back problems after surgery further reduced my mobility and endurance. Although I still enjoy camping and shorter hikes, I can no longer backpack or hike long distances as I could in the past. However due to the presence of these strips I can still enjoy my passion for the fantastic southern Utah country and hopefully will be able to instill some of my love of this land in my grandkids. I realize that there are many outdoor users who are opposed to allowing aviation access, but in reality this is a very low impact method of accessing these regions. There is less pressure on the area from light plane use than from recreational vehicles or horses, both of which can cause substantial damage to the terrain and in the case of horses can add a significant biological load that takes a long time to decompose in the arid climate. In addition,	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
			those who wish to bike, hike, etc in these areas have to drive substantial distances over dirt roads, which also stresses the environment and adds noise concerns. These strips should therefore, in my opinion, be viewed as trailheads which allow low impact entry and usage and actually help protect much of the environment. They also are a potentially valuable access point if needed to rescue injured outdoorsman within the area. The Utah Back Country Pilots Association, of which I am proud to be a member, stresses aviation safety and strongly endorses a low impact, leave no trace behind, philosophy. Though a long time pilot, my access to a suitable backcountry airplane and knowledge of the skills needed to safely fly into these areas is much more recent. The members of this organization have been very helpful in teaching me the skills necessary to safely fly and enjoy the backcountry. I also appreciate the fact that they are devoted to working in a cooperative way with land managers and other users and that they are willing to expend much personal time, effort and resources to assist in keeping these valuable resources open and safe.	
Ron	Apfelbaum	Transportation and Access	I therefore strongly support Alternative D and the provisions of the first draft of the RMP that provide for continued use of the airstrips at Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat/Peter's Point. I specifically urge that these provisions be kept in the final draft of the RMP. In addition I respectfully request some sort of official language be added to the RMP that will safeguard the future casual use and visitation of the other airstrips in the RMP area.	Please see general comment response #21
Ron	Apfelbaum	Transportation and Access	I therefore strongly support Alternative D and the provisions of the first draft of the RMP that provide for continued use of the airstrips at Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat/Peter's Point. I specifically urge that these provisions be kept in the final draft of the RMP. In addition I respectfully request some sort of official language be added to the RMP that will safeguard the future casual use and visitation of the other airstrips in the RMP area.	Please see general comment response #21
Ron	Apfelbaum	Transportation and Access	I therefore strongly support Alternative D and the provisions of the first draft of the RMP that provide for continued use of the airstrips at Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Crush Flat/Peter's Point. I specifically urge that these provisions be kept in the final draft of the RMP. In addition I respectfully request some sort of official language be added to the RMP that will safeguard the future casual use and visitation of the other airstrips in the RMP area.	Please see general comment response #21
Rose Marie	Araya	Minerals and Energy Resources	Nine Mile Canyon in Utah, part of a powerful landscape of red rock, cliffs and valleys, is quickly moving through the Bureau of Land Management's (BLM) fast-track process for oil and gas drilling. A draft Resource Management Plan (RMP) would allow oil and gas drilling under the surface extending to the canyon bottom, a practice that endangers the canyon's ancient rock art and the remnants of native settlements. Please protect the canyon bottom and sides of Nine Mile Canyon from any drilling or industrial development. We should not allow short term exploitation to cause the destruction of irreplaceable historic places.	Please see general comment response #18
Louis	Arevalo	OHV Route Identification	I believe that there should be a sound plan which protects the wilderness from development and provides ORV's an acceptable trail designation.	Please see general comment response #12
Iris	Arno	OHV Route Identification	The BLM should move promptly to protect the areas where ORV damage is too great including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment response #19
Dick	Artley	OHV Route	Your off-road vehicle plan needs more work. There are too many ORV trails being proposed to be left open to	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
		Identification	these noisy, destructive machines and too few proposed to be closed. You need to try again. Why can't you understand that motorized use at the level you propose will adversely affect primitive and quiet recreational activities; riparian areas, and wildlife habitat.	
Dick	Artley	Process and Procedures	I have seen the proposal that Castle Country Heritage and the Southern Utah Wilderness Coalition has sent to you. It is far superior than anything you came up with. It really represents an alternative with the citizen-owners of our public lands as first priority, rather than corporations. Their alternative protects wilderness-quality lands and other sensitive areas from oil and gas development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land. Please jump at the opportunity to protect these beautiful lands of the Price Resource Area by analyzing and adopting alternative sent to you by the Castle Country Heritage and the Southern Utah Wilderness Coalition. Compared to what you have come up with so far, it is the only alternative for a thinking person and a caring person. Please do the right thing. Already American corporations control this country. Have the guts to draw the line in the sand and tell them NO!!!!!!	Please see general comment response #35
Robert	Askerlund	OHV Route Identification	Why are none of the OHV community submittals reflected on the OHV route designation maps?	The route designation process was started from a baseline of known existing routes. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. See general comment responses #20 and #31
Robert	Askerlund	Transportation and Access	Access that doesn't require back-packing is now essential for our full enjoyment. ATV's have filled that void for us and helped make up for some of the shortcomings of aging and health decline.	Please see general comment response #10 and #80
Robert	Askerlund	Transportation and Access	The San Rafael Swell contains thousands of miles of roads and trails. Unreasonable and unjustifiable restrictions in these areas are not in the best interest of any of this country's residents. Please give consideration to the comments made by our group.	Please see general comment response #10
Ed	Askew	OHV Route Identification	I am a resident of the State of Utah. I live here full time and recreate here every chance I get. My family loves to recreate in the San Rafael Swell area. We love to ride ATVs as a family. We don’t like to backpack nor sleep in tents. We like to pull off the main road, level our trailer and camp. We have many fond memories camping, sitting by the fire enjoying each others company and ATV ridding some of the most beautiful area in the country. The area is a great place to recreate and should stay open so people can recreate their, the way they prefer. As you can see in the pictures we have left no damage and we have taken nothing but memories. Don’t take that away from my family and future generations. With just over 2 million people in this state and over 130,000 owning ATV with ownership increasing each year by double digits added with street legal OHV (jeeps and SUVs) and motorcycles, families like mine with 5 members and 3 ATVs you get a very large percentage of people in this state wanting to recreate with vehicles. I would like to know where we will be allowed to recreate. With 78 percent of the land in this state owned by the federal government there isn’t much	Please see general comment responses #19 and #37

First Name	Last Name	Category	Comment	Response
			land left privately to recreate without doing it on public land. You closed half of the roads when you created your new San Rafael Route Designation Plan and now with this plan it seems that we are closing even more. There are so many management layers to this plan and none of them seem to even have the San Rafael Route Designation Plan included, how do we know what will be open and what will be closed. With a four year degree and what I thought of as a logical mind, after attempting to read this DEIS and DRMP I find it impossible to understand and I cannot see how the average American will ever be able to understand it. Instead of hiding what the BLM is doing with layers of management plans each alternative should clearly show what the BLM is changing to the San Rafael Route Designation Plan.	
Ed	Askew	OHV Route Identification	I would like to know where we will be allowed to recreate. With 78 percent of the land in this state owned by the federal government there isn't much land left privately to recreate without doing it on public land. You closed half of the road when you created your new San Rafael Route Designation Plan and now with this plan it seems that we are closing even more. There are so many management layers to this plan and none of them seem to even have the San Rafael Route Designation Plan included, how do we know what will be open and what will be closed... after attempting to read this DEIS and DRMP I find it impossible to understand and I cannot see how the average American will ever be able to understand it. Instead of hiding what the BLM is doing with layers of management plans each alternative should clearly show what the BLM is changing to the San Rafael Route Designation Plan... Many of the green lines open to OHV are on blacktopped roads that are illegal to OHV roads. There are no connecting trails to the Arapeen trail system. The Chimney Rock/Summerville Trail system is not included in the preferred alternative. I couldn't tell if the loop trail of buckthorn wash to the wedge down fuller bottoms across coal wash and then down devils race track would be open but I sure hope it would.	Please see general comment responses #19, #20, #31 and #31
Ed	Askew	OHV Route Identification	Another disturbing proposal is the fact that the BLM is going to reduce the size of groups that can recreate in the Swell. The size limits will make some families in the state of Utah unable to recreate here because of there size. It will also stop the majority of families recreating with extended family. This is Un-American and totally unacceptable.	Please see general comment response #81
Danny	Astill	OHV Route Identification	The BLM states that the San Rafael Route Designation Plan will be incorporated into the new management plan, but it does not state or disclose to the public other management "layers" which will make significant road and trail closures. The BLM must completely and accurately disclose all the changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment responses #19 and #31
Danny	Astill	OHV Route Identification	The BLM indicates many miles of roads will be open for OHV use via the preferred alternative OHV designation map. Unfortunately, most of the green lines on the map 2- are actually closed to unlicensed OHV use. Please state the facts of how many miles of OHV routes on maps 2-56 are currently illegal for unlicensed OHV use.	Please see general comment response #78
Danny	Astill	OHV Route Identification	All the popular OHV trail systems must remain open in the chimney rock/summerville and humbug trail systems, with designated links to the Arapeen trail system. Additionally, all the existing roads and trails in use now must, remain open.	See general comment responses #19 and #20.
Danny	Astill	Process and Procedures	The BLM has proposed overlapping management layers in the San Rafael Swell, which each layer brings it's own discrete management restrictions, and yet these restriction are not drawn along any recognizable geographic boundaries making compliance impossible. As one of the general public recreating in this area, it makes me wonder if this is just another deceptive practice to restrict the use of these areas by making it hard to understand and easy to get in to trouble, which will keep people away! I absolutely oppose all the different management layers outlined in the draft plan.	Please see general comment response #37

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Danny	Astill	Recreation	The BLM is proposing very restrictive group size limitations. The group size limits being proposed puts large families, clubs and just the public under unfair and arbitrary restrictions. According to the analysis conducted in the SRRDP, OHV use under current use levels show no significant impacts. Therefore, there is no justification for the group size limit proposed in any of the stated alternatives. The BLM should stick with the proven 50 vehicle limit, and stop trying to impose National Park management on Public Lands.	Please see general comment response #81
Anamarie	Aurielle	Cultural Resources	Please re-clarify the land management purpose in terms of what benefits ALL of the people in the US that the Department of Interior is meant to represent. Consider the possibility that our country's archeological treasures are as much a natural resource as is gas or fossil fuels and then answer the hard question, What price (environmental, social, political) is worth the destruction of such rare antiquities?	Please see general comment response #9
Anamarie	Aurielle	Minerals and Energy Resources	Limit the TIMES and DAYS of the week when they can run machinery up and down Cottonwood and 9 Mile Canyon to something that reasonably reflects and considers the OTHER competing interests. IF COMPETING INTERESTS ARE TO CO-EXIST, THEN BOTH SIDES MUST BE CONSIDERED, not just the one with more money. To maintain the credibility and integrity of what the BLM stands for, insist that industrial interests maintain the same level of preservation of the area that you require from sightseers! You threaten us with legal action if we deface the area, but give carte blanche to the gas company to deface as they will... It is common practice to require businesses operating in pristine environments like 9 Mile Canyon to spend a SIGNIFICANT percentage of their operating budgets on environmental protection efforts... particularly since the Exxon debacle in Alaska. Please don't wait until more damage has been done to set this standard.	Please see general comment response #18
Marty	Auriemma	OHV Route Identification	I have been vacationing in southeastern Utah for the past five years and hope to continue for years to come. A trip is already planned for spring 2005. Over the five years, I have noticed an enormous increase in ORV damage on BLM lands. The damage has been devastating from an environmental point of view, but also from an aesthetic point of view. A case in point - everywhere I traveled in the San Rafael Swell this past May had ORV damage. There was not one vista that was untouched. I believe there is a way for all to enjoy such places and to save them for future generations. One solution may be for the RMP to adopt a closed unless signed open policy to more effectively manage for off-road vehicle use.	Please see general comment response #19
Colleen	Back	Transportation and Access	I am writing to express my support of backcountry airstrip use in Utah. I encourage you to support Alternative D in your BLM assessment of Price area public lands.	Please see general comment response #21
Lee	Badger	Process and Procedures	As you manage your district, I would ask that you manage for sustained conservation and manage as indicated by science.	Please see general comment response #1
Byron	Baird	OHV Route Identification	Livestock grazing done properly is more environmental friendly than many people think. Great time and care is given to the land to ensure that it will be preserved for future use. The real problems lie in allowing motorized vehicles unlimited access to undisturbed ground. These motorized vehicles tear the ground up disrupting the growth of grass and causing irreparable erosion. More care needs to be given to grazing permits than to off road vehicle permits.	Please see general comment response #19
Glenda	Baker	Minerals and Energy Resources	Don't allow oil companies to ruin these areas for a short term gain.	Please see general comment response #18
Glenda	Baker	OHV Route	This also applies to Off Road Vehicles. Once the land is torn up it's too late.	Please see general comment response #19

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		Identification		
Kathryn	Baker	OHV Route Identification	Designating every trail as a motorized route is outrageous, destructive as well as irresponsible. The BLM needs to get its act together and make a comprehensive plan that considers those who may not want to be within sight of a noisy smelly vehicle. Why exactly do they believe that it's a good idea to open this ENTIRE area to vehicles? Can't we save something for future generations?	Please see general comment response #19
Pamela	Baker	Cultural Resources	Please consider giving Nine Mile Canyon the protection it merits under your new Resource Management Plan. The canyon walls and bottom need to be protected from all intrusions including gas and oil exploration or development. We can never replace the cultural treasures existent in the canyon.	Please see general comment response #9
Eric	Balken	Minerals and Energy Resources	It is also important to me that you give time and discussion when considering drilling or mining in these areas.	Please see general comment response #18
Eric	Balken	OHV Route Identification	I feel that off road vehicle trails should be properly enforced and the land managed.	Please see general comment response #19
Jeanne and Rich	Bando	OHV Route Identification	The BLM should not designate any 'open areas' where ORV use is allowed without limitation. There also should not be any ORV trails on lands within America's Redrock Wilderness Act or in wilderness study areas.	Please see general comment response #12
Layne	Barber	OHV Route Identification	I am an ATV owner that wants to find a good balance between those who want OHV access & those who want to severely limit use. I have enjoyed riding in areas throughout the state & have always tried to be educated with maps & to follow trail designations. Because of physical limitations, an ATV allows me the ability to enjoy recreational/wildlife areas in the state. (Places my tax dollars help to support) I would agree that there should be areas set aside & be allowed to remain pristine but where trails already exist, they should be designated & mapped. Especially trails that are only ATV accessible. We need more than just dirt roads to ride on. I wouldn't be opposed to a ban & severe punishment on pioneering of new trails (except as deemed necessary by the govt. to enhance present trails) as long as all existing trails were made available for riding. As is usually the case, it is a small minority of ATV riders that aren't trail friendly and give ATV riders a bad name. Those of us who care about the land & love the sport are being restricted because of the actions of a few (& the desires of a few) Please take a balanced, reasoned approach in the study & implementation of your decision.	Please see general comment response #19
Steven	Barger	Minerals and Energy Resources	Oil and gas development should be minimized, if not prohibited, in these outstanding public lands.	Please see general comment response #18
Steven	Barger	OHV Route Identification	I am also concerned about the explosion of off-road vehicle traffic. The public should not be allowed to create new routes without rigorous review and analysis of such routes, particularly with regard to their impact on the wilderness character of lands in this jurisdiction. Similarly, there should be no “free for all” zones where such travel is totally unrestricted.	Please see general comment response #19
Ryan	Barker	OHV Route Identification	Designate areas for ORV use that is not in conflict with the fragile ecosystem. Trails should be mapped and clearly marked as to rid any confusion as to where to ride. One important factor in keeping areas with designated trails confined to the existing plan is enforcement and I would challenge the BLM to keep up the enforcement.	Please see general comment responses #19
Ryan	Barker	Minerals and Energy Resources	It stresses me to read the proposed plans of possibly opening these areas to exploration for oil and gas for such a short gain and big long term losses. I feel as though I should take sidelines due to my position and goals I have	Please see general comment response #45

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			with other state agencies but I find that hard when I have spent a great deal of time and research hours in those places.	
Ryan	Barker	OHV Route Identification	I would stress the importance of protecting and preserving these areas for the future. Designate areas for ORV use that is not in conflict with the fragile ecosystem. Trails should be mapped and clearly marked as to rid any confusion as to where to ride. One important factor in keeping areas with designated trails confined to the existing plan is enforcement and I would challenge the BLM to keep up the enforcement.	Trail marking and enforcement will be considered as part of a travel management plan that will be developed to implement the RMP. These activities are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS.
Justin	Barnett	ACEC	The current plan violates the public duty of the BLM by: Failing to protect lands that contain significant cultural, geologic, scenic, recreational, and plant and wildlife habitat as Areas of Critical Environmental Concern (ACECs) safe from the self serving private interests of corporate America.	Please see general comment response #30
Justin	Barnett	Minerals and Energy Resources	I worked in the oil industry and there is no such thing as a "clean" oil drilling and production site despite all the propaganda of the oil companies. The incursion and mechanical activity alone will ruin these serene and desolate areas. Besides that how could this be so lopsided? 20% preserved and the rest to be exploited for private gain and wasted? That's outrageous!	Please see general comment response #18
Justin	Barnett	Minerals and Energy Resources	The current plan violates the public duty of the BLM by offering citizen proposed wilderness lands to oil companies for development instead of preserving these special places now proposed for wilderness from oil and gas development. Preservation of these areas will ensure that these natural wonders, critical plant and animal habitat, riparian corridors, and ecologically sensitive areas will not be squandered for short-term, speculative gain by non-public private corporate interests.	Please see general comment response #101
Justin	Barnett	OHV Route Identification	Regarding off-road vehicles, although the BLM has committed to designating trails, you have left open illegal, user-created routes that are detrimental to protecting Utah wilderness. The plan leaves open routes in Wilderness Study Areas. Again, the incursion and mechanical activity alone ruin these serene and desolate areas not to mention the outright illegal nature of these trails.	Please see general comment response #12
Justin	Barnett	OHV Route Identification	The current plan violates the public duty of the BLM by failing to designate off-road vehicle trails outside of citizen proposed wilderness areas. Failing to designate citizen proposed wilderness areas as semi-primitive non-motorized and acting to protect them as such	Please see general comment response #12
Justin	Barnett	Process and Procedures	The current plan violates the public duty of the BLM by failing to protect lands that contain significant cultural, geologic, scenic, recreational, and plant and wildlife habitat as Areas of Critical Environmental Concern (ACECs) safe from the self serving private interests of corporate America.	Please see general comment response #1
Justin	Barnett	Wilderness	Of more than 1.5 million acres proposed for wilderness preservation in America's Red Rock Wilderness Act (90% of which the BLM has previously agreed has wilderness characteristics), nearly 1 million acres will be open to oil, gas, and mineral development. Of the entire 2.5 million-acre planning area, only 584,128 acres will be closed to leasing (almost all of which are Wilderness Study Areas already protected from leasing by Congressional mandate). This is a travesty. These areas have always been remote and, other than some grazing activity, pristine.	Please see general comment response #111
Ken	Barney	OHV Route Identification	I understand that there are extreme closures planned. I feel that this is extremely unfair. I feel that the BLMs maps must be updated to accurately portray the OHV designations outlined in each alternative. How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use?	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives analyzed in detail. Currently, only State roads are restricted to

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				licensed vehicle. No further restrictions on the use of unlicensed vehicles are included in the Proposed RMP. Any additional restrictions on use of unlicensed vehicles would be initiated on an as-needed basis and would be made through activity level planning following completion of the RMP. See general comment response #78
Reese	Barrick	Paleontology	As a professional paleontologist, the Price RMP is clearly inadequate with respect to the protection of fossil resources.	Please see general comment response #91
Reese	Barrick	Paleontology	The preferred alternative D on page 2-37 is a no action alternative and proposes that assessment is required on a case-by-case basis. What does this mean? Who determines which cases need assessment and mitigation. The fossil resources in the areas covered by the RMP are rich and extremely valuable with new dinosaur species found at a rate similar to areas in China and Africa. Yet the fossiliferous sites are not continuous over large areas. Much of the region is yet to be surveyed for fossils systematically. Even the most comprehensive alternative (C) does not go far enough. It states that assessment and mitigation will occur in all areas where significant fossils are known or expected to occur. Who determines where they are expected to occur? Only 20 years ago, the Cedar Mountain Formation was thought to be barren of fossils and now it produces new dinosaurs at a prodigious rate. Limiting assessment to where significant fossils are already known completely defeats the purpose. Predictive modeling and broad scale sampling would be appropriate but perhaps beyond the resources of the BLM and predictive modeling would take time and not necessarily be valid in the end. However, requiring assessment and possible mitigation of all surface disturbing actions would serve to provide the broad scale sampling noted in alternative B. Paleontological surface assessment is a tax deductible expense for businesses and can be achieved very quickly in most areas. It would not be prohibitive in either time or costs for mineral exploration and yet would serve to increase the broad scale sampling and also preserve potentially valuable vertebrate fossil resources and would promote and facilitate the scientific investigation of fossil resources. Alternative A provides less protection that there is now as mitigation is limited to the response of reports of finds presumably by the company or agency that may find it to their economic benefit to not report the find and assessment is not specifically mentioned. Clearly Alternatives A, B, and D are not only inadequate but are also not responsible. Alternative C is the best proposed alternative but still leaves assessment to a case-by-case basis and only to areas where there are known or expected fossils. This is clearly inadequate as most areas have not been surveyed. Leaving the determination of which cases must carry an assessment to an individual that may have little or no experience in fossil collecting themselves in the impacted areas and who could be pressured by other interests to not require assessment does nothing to preserve or survey for crucial fossil localities.	Please see general comment response #91
Reese	Barrick	Paleontology	Most plant and invertebrate localities may certainly be used for hobby collection as they are generally numerous. However, there are cases of rare and scientifically significant localities that should be preserved and protected. New species are vital to increasing our understanding of the history of life and important ecologic studies need localities where populations can be scientifically sampled and studied. New technologies are continuously developed that require well preserved fossils which are the first to go with hobby collecting. These especially significant localities for plants and invertebrates are rare and their protection, while important, would not affect the ability of the hobby collectors pursue their interests.	The RMP does not designate any area for hobby collection, but allows for such designations to occur. The scientific values of a potential collection area will be reviewed by qualified paleontologists (see BLM Handbook 8270-1 Chapter 4- C.2). Areas with scientifically significant nonvertebrate fossils would not be identified for hobby collection.

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Reese	Barrick	Paleontology	Below are the guidelines developed by the Society of Vertebrate Paleontology Conformable Impact Guidelines Committee. These could and should be followed in the RMP: ASSESSMENTAND MITIGATION OF ADVERSE IMPACTS TONONRENEWABLE PALEONTOLOGIC RESOURCES: STANDARD GUIDELINES INTRODUCTION Vertebrate Fossils are significant nonrenewable paleontological resources that are afforded protection by federal, state and local environmental laws and guidelines. The potential for destruction or degradation by construction impacts to paleontological resources on public lands (federal, state, county. or municipal) and land selected for development under the jurisdiction of various governmental planning agencies is recognized. Protection of paleontological resources includes: (a) assessment of the potential property to contain significant non renewable paleontological resources which might be directly or indirectly impacted, damaged or destroyed by development, and (b) formulation and implementation of measures to mitigate adverse impacts, including permanent preservation of the site and/or permanent preservation of salvaged materials in established institutions. Decisions regarding the intensity of that Paleontological Resources Impact Mitigation Program (PRIMP) will be made by the Project Paleontologist on the basis of the Paleontologic resources, not on the ability of an applicant to fund the project. ASSESSMENT OF THE PALEONTOLOGICAL POTENTIAL OF ROCK UNITS: Sedimentary Rock units may be described as having (a) high (or known) potential for containing significant nonrenewable paleontological resources, (b) low potential for containing nonrenewable paleontological resources, or (c) undetermined potential. It is extremely important to distinguish between archaeological and paleontological (=fossil) resource sites when defining the sensitivity of rock units. The boundaries of archaeological sites define the areal extent of the resource. Paleontological sites, however, indicate that the containing sedimentary rock unit or formation is fossilferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the paleontologic potential in each case. Paleontologists can thus develop maps which suggest sensitive areas and units that are likely to contain paleontological resources. These maps form the bases for preliminary planning decisions. Lead Agency evaluation of a project relative to paleontologic sensitivity maps should trigger a "request for opinion" from a state paleontologic clearing house or an accredited institution with an established paleontological repository. The determination of a site's (or rock unit's) degree of paleontological potential is first founded on a review of pertinent geological ad paleontological literature and on locality records of specimens deposited in institutions. This preliminary review may suggest particular areas of known high potential. If an area of high potential cannot be delimited from the literature search and specimen records, a surface survey will determine the fossilferous potential and extent of the sedimentary units within a specific project. The field survey may extend outside the defined project to areas where rock units are better exposed. If an area is determined to have a high potential for containing paleontologic resources a program to mitigate impacts is developed. In areas of high sensitivity a pre-excavation survey prior to excavation in recommended to locate surface concentrations of fossils which might need special salvage methods. The sensitivity of rock units in which fossils occur may be divided into three operational categories: I. HIGH POTENTIAL Rock units from which vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a have potential for containing significant non renewable fossilferous resources. These units include but are not limited to, sedimentary formations and some volcanic formations which contain significant nonrenewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils.	Thank you for including the Society of Vertebrate Paleontology's guidelines. However, BLM management of Paleontological resources is directed by the national BLM Handbook 8270-1 (General Procedural Guidance For Paleontological Resource Management), first issued in July 1998. The Price RMP revision process will not amend Handbook 8270-1, but the Handbook incorporates many of the suggested guidelines.

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			Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate. invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxononic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than Recent, including deposits associated with nests or middens, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant. II. UNDETERMINED POTENTIAL. Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossilferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed. III. LOW POTENTIAL. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils. Such units will be poorly represented by specimens in institutional collections. These deposits generally will not require protection or salvage operations. MEASURES TO MITIGATE ADVERSE IMPACTS RESULTING FROM DEVELOPMENT: Measures for adequate protection or salvage of significant nonrenewable paleontological resources are applied to areas determined to have a high potential for containing significant fossils. Specific mitigation measures generally need not be developed for areas or low paleontological potential. Developers and contractors should be made aware, however, that it is necessary to contact a qualified paleontologist if fossils are unearthed in the course of excavation. The paleontologist will then salvage the fossils and assess the necessity for further mitigation measures, if applicable. Areas of High Potential In area determined to have a high potential for significant paleontological resources, an adequate program for mitigating the impact of development should include: (1) a preliminary survey and surface salvage prior to construction; (2) monitoring and salvage during excavation; (3) preparation, including screen washing to recover small specimens (if applicable), and specimen preparation to a point of stabilization and identification; (4) identification, cataloging, curation, and storage; and (5) a final report of the finds and their significance after all operations are completed. All phases of mitigation are supervised by a professional paleontologist who maintains the necessary paleontological collecting permits and repository agreements. The Lead Agency assures compliance with the measures developed to mitigate impacts of excavation during the initial assessment. To assure compliance from the start of the project, a statement that confirms the site's potential sensitivity confirms the repository agreement with an established institution, and describes the program for impact mitigation, should be deposited with the Lead Agency and contractors before work begins. The program will be reviewed and accepted by the Lead Agency's designated vertebrate paleontologist. If a mitigation program is initiated early during the course of project planning, construction delays due to paleontologic salvage activities can be minimized or avoided. RECOMMENDED GENERAL GUIDELINES: These guidelines are designed to apply to areas of high	

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			paleontological potential. Assessment Before Construction Starts. Preconstruction assessment will develop an adequate program or mitigation. This may include a field survey to delimit the specific boundaries of sensitive areas and pre-excavation meetings with contractors and developers. In some cases it may be necessary to conduct field survey and/or a salvage program prior to grading to prevent damage to known resources and to avoid delays to construction schedule. Such a program may involve surface collection and/or quarry excavations. A review of the initial assessment and proposed mitigation program by the Lead Agency before operations begin will confirm the adequacy of the proposed program. Adequate Monitoring. An excavation project will retain a qualified project paleontologist. In areas of known high potential, the project paleontologist may designate a paleontologic monitor to be present during 100% of the earth-moving activities. If, after 50% of the grading is completed, it can be demonstrated that the level of monitoring should be reduced, the project paleontologist may so amend the mitigation program. Paleontologists who monitor excavations must be qualified and experienced in salvaging fossils and authorized to temporarily divert equipment while removing fossils. They should be properly equipped with tools and supplies to allow rapid removal of specimens. Provisions should be made for additional assistants to monitor or help in removing large or abundant fossils to reduce potential delays to excavation schedules. If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location may be individually monitored. Macro Fossil Salvage. Many specimens recovered from paleontological excavations are easily visible to the eye and large enough to be easily recognized and removed. Some may be fragile and require hardening before moving. Others may require encasing within a plaster jacket for later preparation and conservation in a laboratory. Occasionally specimens encompass all or much of a skeleton and will require moving either as a whole or in blocks for eventual preparation. Such specimens require time to excavate and strengthen before removal and the patience and understanding of the contractor to recover the specimens properly. It is thus important that the contractors and developers are fully aware or the importance and fragility of fossils for their recovery to be undertaken with the optimum chances of successful extraction. The monitor must be empowered to temporarily halt or redirect the excavation equipment away from the fossils to be salvaged. Microfossil Salvage. Many significant vertebrate fossils (e.g.. small mammal, bird. reptile, or fish remains) are too small to be visible within the sedimentary matrix. Fine grained sedimentary matrix and paleosols most often contain such fossils. They are recovered through concentration by screen washing. If the sediments are fossiliferous, bulk samples are	

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			for taken later processing to recover any fossils. An adequate ample comprises 12 cubic meters (6,000lbs or 2,500 kg) of matrix for each site horizon or paleosol, or as determined by the supervising paleontologist. The uniqueness of the recovered fossils may dictate salvage of larger amounts. To avoid construction delays, samples of matrix should be removed from the site and processed elsewhere. Preservation of Samples Oriented samples must be preserved for paleomagnetic analysis. Samples of fine matrices should be obtained and stored for pollen analysis. Other matrix samples may be retained with the samples for potential analysis by later workers, for clast source analysis, as a witness to the source rock unit and possibly for procedures that are not yet envisioned. Preparation. Recovered specimens are prepared for identification (not exhibition) and stabilized. Sedimentary matrix with microfossils is screened washed and sorted to identify the contained fossils. Removal of excess matrix during the preparation process reduces storage space. Identification. Specimens are identified by competent qualified specialists to a point of maximum specificity. Ideally, identification is of individual specimens to element, genus, and species. Batch identification and batch numbering (e.g., “mammals, 75 specimens”) should be avoided. Analysis. Specimens may be analyzed by stratigraphic occurrence, and by size, taxa, or taphonomic conditions. This results in a faunal list, a stratigraphic distribution of taxa, or evolutionary, ecological, or depositional deductions. Storage. Adequate storage in a recognized repository institution for the recovered specimens is an essential goal of the program. Specimens will be cataloged and a complete list will be prepared of specimens introduced into the collections or a repository by the curator of the museum or university. Adequate storage includes curation of individual specimens into the collection of a recognized, nonprofit paleontologic specimen repository with a permanent curator, such as a museum or a university. A complete set of field notes, geologic naps, and stratigraphic sections accompany the fossil collections. Specimens are stored in a fashion that allows retrieval of specific, individual specimens by researchers in the future. Site Protection. In exceptional instances the process of construction may reveal a fossil occurrence of such importance that salvage or removal is unacceptable to all concerned parties. In such cases, the design concept may be modified	

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			to protect and exhibit the occurrence within the project's design, e.g., as an exhibit in a basement mall. Under such circumstances, the site may be declared and dedicated as a protected resource of public value. Associated fragments recovered from such a site will be placed in an approved institutional repository. Final Report. A report is prepared by the project paleontologist including a summary of the field and laboratory methods, site geology and stratigraphy, faunal list, and a brier statement of the significance and relationship of the site to similar fossil localities. A complete set of field notes, geological maps, stratigraphic sections and a list of identified specimens accompany the report. The report is finalized only after all aspects of the program are completed. The Final Report together with its accompanying documents constitute the goals of a mitigation project. Full copies of the Final Report are deposited with the Lead Agency and the repository institution. A LEAD AGENCY is the agency responsible for addressing impacts to nonrenewable resources that a specific project might generate. PALEONTOLOGICAL POTENTIAL is the potential for the presence of significant nonrenewable paleontological resources. All sedimentary rocks, some volcanic rocks, and some metamorphic rocks have potential air the presence of significant nonrenewable paleontological resources. Review of available literature may further refine the potential of each rock unit formation, or facies. PALEONTOLOGIC SENSITIVITY is determined only after a field survey of the rock unit in conjunction with a review of available literature and paleontologic locality records. In clues where no subsurface data are available sensitivity may be determined by subsurface excavation.	
Reese	Barrick	Socioeconomics	The preservation and study of fossil, especially vertebrate resources is not only scientifically valid but also has an important economic impact for the region and should not be treated as trivially as the Price RMP does.	The commentor provides no data to support the contention that this activity has an important economic impact to the planning area. Nor does the commentor indicate how the plan's decisions or analysis are in error as a result of the alleged "trivial" treatment in the plan.
Debra	Barringer	OHV Route Identification	I was dismayed to find out that the current alternatives of the Draft RMP do not effectively protect some of my favorite areas to visit from oil and gas leases and ORV vehicle overuse. These include Nine Mile Canyon, the San Rafael Swell, Wild Horse Mesa, and Crack Canyon. I have reviewed the proposed Castle County Heritage Plan and feel it does a better job of balancing all uses, reflecting the majority of people's values of these areas, and protecting irreplacable resources. ORV use may be currently popular, but is it a sustainable use of fragile lands that contain rare plants, and crusts that prevent erosion and are easily destroyed? Please consider the Castle County Plan and the sustainability of these wild vistas. You may not be fully aware of the economic impact of visitors like myself that would stop coming if our favorite areas are ruined.	'The planning team developed and analyzed a full range of alternatives, as required by law, regulation, and policy. The alternatives were developed through the interdisciplinary team process that included BLM staff specialists and cooperating agencies, and public input. Importantly, the alternatives were crafted to be responsive to the issues, concerns, and opportunities identified for resolution in the planning process. Further, in the development of the plan alternatives, BLM also considered the planning decisions in the existing 1983 Price River Management Framework Plan (MFP) and the

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				existing 1991 San Rafael Resource Management Plan (RMP) that were still valid and responsive to the issues. BLM gave careful consideration to the Castle Country Heritage Plan (CCHP), and in fact, incorporated parts of the plan into the range of RMP alternatives. While the CCHP is multiple-use in nature, it doesn't meet the purpose and need for the land use plan as it does not address all resource values and uses BLM is required to manage on public lands. BLM has reviewed the CCHP and compared it to the range of alternatives analyzed in the Draft and Final EISs. The range of alternatives in the RMP encompasses the CCHP; therefore the CCHP is not carried forward as a separate alternative. BLM used the information presented in the CCHP in the refinement of the proposed OHV motorized route designation plan.
Teresa	Barth	Minerals and Energy Resources	I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict	Please see general comment response #18
Roger	Barthelson	Minerals and Energy Resources	It doesn't give anywhere near a reasonable consideration to uses outside of off-road vehicle use and oil and gas development.	Please see general comment response #18
Roger	Barthelson	Minerals and Energy Resources	I don't really think any oil and gas development should be done in most of the area. I understand that some of the petroglyphs are already being threatened by trucks brought in for gas development. Plus I think that development could detract from or lead to the destruction of the Range Creek archaeological sites.	Please see general comment response #18
Jeff	Baugh	Transportation and Access	Allowing access to these airstrips is of upmost importance to me and I would like the BLM to allow airstrips to be maintained (or even somewhat improved for safe aircraft operations). Aircraft are non-intrusive and allow access to some areas that would be difficult to reach even by 4 wheelers. Aircraft are also a great way for those with disabilities to be able to enjoy the country. And of course the BLM and other government agencies use aircraft regularly for access for a variety of reasons (i.e. wild life studies, research, fire fighting, etc.). Why would you limit your own access?	Please see general comment response #21
Jeff	Baugh	Transportation and Access	Several years ago, pilots lost access to and use of a wonderful airstrip east of Price called Taylor Landing (I think that was the name). At the time, one of the arguments for closure was that it interfered with the Sage Grouse in some way. And yet, roads, trails, and even a campground were located reasonably close to that airstrip. At the time it felt more like an excuse to close the airstrip than a real environmental issue for the grouse. I don't want to see that happen again. Taylor was a great dirt strip because it was close to the river and any pilot could safety land there. Mexican Mountain is the much the same way although more challenging to use. It's beautiful, located near the river, close	Please see general comment response #21

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			to some spectacular hiking, and it's somewhat remote. In short a wonderful destination for a pilot and his airplane to have a quite weekend. There is a tendency to close airstrips or locate them far away from anything of interest. Because pilots are such a small user group, we tend to lose more battles than we win.	
Jeff	Baugh	Transportation and Access	Airposts of all varieties are being closed at an alarming rate across the country. One thing I would like the BLM to understand about aviation is that the big disadvantage of flying into the backcountry is getting from the airstrip to other points of interest.	Please see general comment response #21
Jeff	Baugh	Transportation and Access	Some pilots carry bikes with them but most of us are restricted to walking from our aircraft to whatever sites we desire to visit. So having the airstrip reasonably close to “the scenery” is a big deal. I would prefer not to walk miles and miles to see the sites. Think of it this way. With the Taylor Landing airstrip closed, I would have to walk from Dutch John to what was the Taylor Landing airstrip to see it. I’m not likely to do that. At the same time, I don’t want to be restricted to designated airstrips ether. Give me 1000’ of reasonably straight and level road and I’ll land on it. A good pilot in the right airplane can really do it in a lot less “runway” than that. In general, I am for the land being open to the public for use by airplane,4X4, ATV’s, hikers, bikers, horses, etc. In the above-mentioned TV program, one gentleman stated that he likes to be able to go out to do his thing (repelling and rock climbing) and not see or hear another person (or hear any manmade noise). If one were to imply from that statement that the land should be closed down or access restricted to provide such an experience, I am very much against that type of management. I have spent many days in the wilderness and usually see very few other people (and at times none). I don’t see that imposing sever restrictions would serve a purpose. When I’m camping, I see a few people on ATV’s or in Jeeps and of course I see other pilots. Seeing the occasional person is more of a comfort to me than not, knowing that if I were to get into some kind of trouble, someone might come along and help me.	Please see general comment response #21
Jeff	Baugh	Transportation and Access	My biggest concern with vehicles is that some one will do donuts on the runway causing ruts that will damage/injure me, my airplane, or both. I believe the country is big enough for all of us. Every effort should be made to maintain open access and even encourage access to the remote areas of Utah.	Please see general comment response #21. The RMP/EIS does not change any existing policy, use, or practice concerning backcountry airstrips. BLM is unable to control encroachments from county roads on airstrips. It is important that pilots fly-over be before landing at any backcountry airstrip, and take whatever measures are necessary to ensure safety.
Jeff	Baugh	Transportation and Access	Please do not close any airstrips. They are very low impact to the environment and valuable to many for many reasons including the BLM.	Please see general comment response #21
Alexa	Baxter	OHV Route Identification	Both activities leave irreversible scars on our lands and, I believe, encourage even more aggressive damaging activity. I believe ORV users are entitled to some areas for their use - and that has been done, but it never seems to be enough. Once an area has been over used and desecrated, they only want prettier, untramped places to go further. This is not right. The effect of the noise, fumes, damage to plant and wildlife should be honestly analyzed when deciding where these vehicles should be allowed.	Please see general comment response #19
Alexa	Baxter	Wilderness	Wilderness is a finite resource - it's not being made anymore. I strongly feel that we should exercise restraint and	Please see general comment response #109

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			curb our appetite for paving, uprooting, and trampling our lands.	
Molly	Beard	Minerals and Energy Resources	Please prevent the use of Redrock Wilderness for oil and its abuse by off road vehicles.	Please see general comment response #18
Richard	Beardall	OHV Route Identification	I am deeply disturbed and concerned regarding trends I have documented within the lands administered by the PFO over the last number of years. There seems to be an oversight in planning for the needs of those like myself who must utilize motorized vehicles to access these lands. In response to the well-documented increase in demand for OHV recreation opportunities, the PRO has overacted and responded with increasing number of closures and a decrease in overall opportunities and experiences offered. I, as well as others in my position, have been harmed by these decisions and do not wish to continue to have our use and enjoyment of BLM lands unreasonably diminished. I have a number of issues I feel should be addressed and fully explained.	Please see general comment response #19
Richard	Beardall	OHV Route Identification	1) The DRMP fails to include a Route Designation Plan. I understand that BLM State Director Wisely has issued planning instructions for Field Offices, instructing them to complete a Route Designation Plan while revising RMPs. The DRMP fails to comply. Certain trail systems such as the Chimney Rock/Summerville trail system are mentioned, but not included on the Route Designation Maps for any of the alternatives (even the no action alternative!)... I believe the PFO must accurately disclose all changes that each alternative may or does make to the San-Rafael Route Designation Plan as well as dispersed camping opportunities. It does not appear to do so... I am left to conclude that all of the alternatives in the DRMP lack a meaningful and manageable route designation plan. These errors represent a fatal flaw in the planning and NEPA process for the following reasons: a) None of the alternatives is clear and concise regarding how BLM has addressed the issue of OHV recreation. b) There is no substantial difference between the alternatives offered in the DRMP. Each alternative includes very similar recreation management. c) Lack of route designation plan violates planning instruction from the State Office. d) BLM does not disclose exactly what changes or impacts each of the alternatives has upon the route designation plan. I don't see how the BLM can remedy these flaws in a FEIS! In fact, I am in doubt that the BLM will be able to correct these flaws legally. The BLM cannot simply come up with a route designation plan in the final EIS. It must present a range of alternatives that address the issue of OHV use. Failing to present a route designation plan in any of the alternatives is a critical error and a fatal flaw that requires BLM re-do the DRMP/DEIS. Suggestions: a) In my opinion the PFO needs to simply start the planning process over! b) The PFO must release a complete and accurate route inventory for public review and comments. c) The PFO should acknowledge the inventory of motorized routes that have been tirelessly identified and confirmed by GPS from local user groups and the counties involved. d) Once completed, the entire inventory needs to be designated OPEN to motorized vehicles. e) The new RMP should include instructions to engage in cooperative management with individuals and organized OHV groups. f) If substantial resource impairment is documented and proven, changes in routes available for OHV use should be made via site-specific activity level planning processes that are open for public comment and review. 2) The BLM has failed in its mandatory duty to provide meaningful public involvement in the development of alternatives... The staff at the BLM PFO has stepped over the legal limit here and I for one will no longer tolerate this. I intend to bring this issue directly to the attention of the Secretary of the Interior... I am necessarily led to believe BLM employees and the PFO are planning to do something (I'm not really sure what) completely different from what they have disclosed to the public in the DRMP/DEIS. Is this true? Is it legal for BLM to do so? Will doing so comply with NEPA? Does BLM think the public will be able to provide meaningful public input on a travel plan that BLM has not disclosed to the public?	Please see general comment response #19
Richard	Beardall	OHV Route	I can't tell the difference between the alternatives. I can't figure out if the BLM wants to keep the San Rafael Route Designation Plan (SRRDP) in place or if the various alternatives will make changes to it. In fact, it seems	The Proposed RMP/Final EIS has been written and edited to provide more clarity than the Draft

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		Identification	the BLM is using a completely different name for the SRRDP! The DRMP refers to something called the 2003 San Rafael Motorized Route Designation Plan (SRMRDP) Page ES-3. Can the BLM tell me when they issued an environmental assessment for the SRMRDP? I was not able to find it on the BLMs website. I can only assume the BLM is referring to the SRRDP, but because the DRMP is unclear I simply cannot tell... Based upon the confusing "layering" of recreation management, it is all but impossible to tell what (a) the BLM wants to do regarding recreation management, and (b) the differences between the alternatives. It is painfully obvious to me and others that the document is not understandable even to those of us who have any modicum of understanding of these kinds of documents, the BLM planning process and the NEPA.	RMP/EIS. The BLM, with assistance of its cooperators (including Carbon and Emery Counties) has evaluated existing routes, considering resource impacts, safety considerations, landscape settings and recreational opportunities. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose would be closed to OHV use. The San Rafael Route Designation Plan (2003) designated approximately 670 miles of routes for recreational OHV use, including four routes within the Sids Mountain WSA that are open on the condition that they continue to meet the WSA non-impairment standard. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E.
Richard	Beardall	OHV Route Identification	In the PFO's Preliminary Analysis of the Management Situation, you state that OHV management and Vehicle Assisted Recreation Activities are the top priorities within your management area. Yet, the DRMP: a)fails to address this issues in any alternatives b)fails to provide a reasonable range of alternatives that address this issue; and c)fails to adequately provide for this legitimate, legal and, for some, necessary activity.	The Proposed RMP would not designate all existing routes as open for use. The route designation process was started from a baseline of known existing routes. BLM, with assistance of its cooperators (including Carbon and Emery Counties) has evaluated existing routes, considering resource impacts, safety considerations, landscape settings and recreational opportunities. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose would be closed to OHV use. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route

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				designations for each of the analyzed alternatives.
Richard	Beardall	Process and Procedures	Regarding another failure to accept meaningful public input, I also wish to bring to the attention of the Secretary the fact that important and imperative information submitted by local citizens and county officials regarding route inventory was, at least to my knowledge, completely ignored. I intend to make the Secretary aware that OHV enthusiasts who reside in Carbon and Emery Counties have fully co-operated and have submitted detailed route information via maps and GPS data. Yet, the PFO appears to have simply refused to consider or incorporate any of it...	The Draft RMP/EIS and Proposed RMP/Final EIS do contain a current map of existing roads in the current inventory (Draft RMP/EIS map 2-54, and Proposed RMP/Final EIS Map 2-72). The inventory includes roads submitted to the BLM by Carbon and Emery County, routes extracted from AGRC maps, routes extracted by remote sensing, and routes submitted by various OHV, motorcycle and off road groups (all without regard to ownership). Roads and routes in the San Rafael Travel Plan area were not part of the original map since that data already exists in the San Rafael Motorized Route Designation Plan.
Richard	Beardall	Process and Procedures	We strongly oppose any addition of ACEC, VRM, ROS-NM or any other designations that preclude or inhibit the sustained yield multiple-use philosophy. Multiple-use can and should be promoted and encouraged through reasonable and realistic planning, rather than through knee-jerk reaction or acquiescence to the radical demands of minority groups.	Please see general comment response #1
Richard	Beardall	Recreation	3) There are no rationale to support group size limits planned for the San Rafael SRMP.... 4)The RMP fails to disclose the effects of the alternatives on those who choose or are required to use vehicle assisted access and recreation in the PFO...	Please see general comment response #81
Richard	Beardall	Socioeconomics	The DRMP fails to address or take into account any of the social or economic impacts upon the local communities and a diverse population base. That base includes a great number of elderly and disabled individuals who recreate in lands administered by the PFO. I see no social or economic impact data presented in regard to any of the alternatives addressed within the DRMP. The PFO needs to provide information regarding social and economic impacts associated with all alternatives addressed in the DRMP. This applies specifically with regard to any elimination or reduction of dispersed camping or motorized access.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of recreation to local communities, such as Emery and Carbon counties. The DEIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities. Due to incomplete data on recreational activities, the analysis was unable to provide quantitative estimate changes to camping and OHV use tied to recreation in the local area. The analysis was re-edited to further evaluate these impacts and is discussed in Chapter 4, Section 4.6.
Joan	Beck	OHV Route Identification	We are extremely disappointed that the DRMP shows a lack of opportunities on the 'strip' for motorized recreation throughout the entire area? Closing any existing roads/trails/ways, etc. would cause innumerable problems for the land managers since motorized recreationists would be forced to congregate into other areas, which would have the potential to damage those 'now' congested sites. These routes must be accurately defined in each alternative.	Please see general comment response #19
Daniel	Bedford	Minerals and Energy Resources	Few restrictions on potential oil and gas explorations leases. This troubles me greatly	Please see general comment response #18

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Daniel	Bedford	OHV Route Identification	The land use plan for the area is being revised, with, as I understand it, few restrictions on potential off road vehicles and dirt bike use.	Please see general comment response #19
Daniel	Bedford	Recreation	I urge you to consider placing some of the San Rafael Swell open to motorized access, and barring motor vehicles from the rest.	Please see general comment response #15
David	Behlings	OHV Route Identification	Please do not close any more OHV roads or trails!!! Isn't public land supposed to be available for multi uses? There are alot of responsible users that deserve to have the ability to enjoy the outdoors. Do not punish them for the actions of a few abusers of the land.	Please see general comment response #19
Rick	Behrmann	OHV Route Identification	Please take into consideration the recreational needs of motorized users who for generations now have used the area being considered, responsibly. To exclude them/us would be a grave injustice. Most motorized users are responsible users who stick to the designated routes, roads, and trails.	Please see general comment response #19
Norton	Bell	OHV Route Identification	The proposed plan fails to provide a balance between motorized and non-motorized recreation. If the agency continues down that path, 99.5% of land in the Price BLM district will be within 3 miles of a route.	Please see general comment response #19
Norton	Bell	OHV Route Identification	Designating every inventoried trail as a motorized route is an irresponsible and unacceptable approach to dealing with motorized recreation. The BLM needs to complete a comprehensive route designation plan that considers non-motorized users of public land, protecting sensitive areas that will be ruined by continued ORV use.	Please see general comment response #19
Mark	Belles	ACEC	Preservation of relic vegetation is a major issue. Once lost, these plant communities can never be restored. Their continued existence testifies to the remoteness of their location. Due to the remote locations, development and use of any sort is usually not feasible. Also certain selected scenic and cultural resources are too valuable to lose. The following ACECs should be designated. Beckwith Plateau, Lower Green River, Pictographs, San Rafael Canyon, Big Flat Tops, Muddy Creek, Price River, Segers Hole, Bowknot Bend, Nine Mile, Rock Art, Sid's Mountain.	Please see general comment response #30
Mark	Belles	Fire and Fuels Management	The plan needs to have a clearly stated goal that the policy regarding fuels and fire be one that endeavors to return the condition of the planning area to one where a natural fire regime is operating. Fire suppression should only be used for fires that threaten significant capital improvements, historical or cultural resources.	The Draft RMP/EIS, page 2-50, contains the following goal: "Manage fire and fuels, where appropriate, to restore natural systems to their desired future condition..." In this light, all wildland fires are evaluated as to what the appropriate management response (APR) will be. The time of year, location, fuels, terrain, weather conditions, resource values, public and firefighter safety, etc. are all considered when determining the actions to be taken on wildland fires. The 2004 Fire Management Plan explains the appropriate management response to each situation in more detail. The RMP allows for wildland fire use in all areas but those with capital investments and those where fire would result in a loss of ecosystem function.
Mark	Belles	OHV Route Identification	The Bureau's deferral of dealing with the OHV issue (DRMP, paragraph 1.6.10.1) is at odds with the stated goal for Soil (DRMP, 2.2.2.1). Continued permission to engage in cross country mechanized (OHV or mountain bikes)	Please see general comment response #19

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			travel does not comply with the Soil goal of "Manage uses to minimize and mitigate damage to soils, including critical soils and fragile chemical and biological soil crusts" (DRMP, 2.2.2.1). Nothing in the DRMP purports to explain how cross country mechanized travel complies to any degree with this goal. Cross country mechanized travel should be banned unless it can be shown that it complies with the Soil goal. From review of the maps, the route density for all the options seems high. No data is presented documenting route mileage per square mile, but this measure is generally accepted as a means of evaluating the impact of routes on the subject area. A frequent used limit for route density is 2.0 miles/square mile should be established and the route inventory should be aligned with this goal. Cross Country OHV use is inconsistent with managing an area so as not impair the suitability for designation as wilderness. OHV use should not be permitted in the following wilderness study areas and areas with wilderness characteristics. Cedar Mesa, Desolation Canyon, Devils Canyon, Eagle Canyon, Hondo Canyon, Humbug Canyon, Jack Canyon, Labyrinth Canyon, Limestone Cliffs, Lost Spring Wash, Mexican Mountain, Molen Reef, Muddy Creek-Crack Canyon, Mussentuchit Badlands, Price River, Rock Canyon, San Rafael Reef, San Rafael River, Sid's Mountain, Sweetwater Reef, Turtle Canyon, Upper Muddy Creek, Wild Horse Mesa.	
Mark	Belles	Wild and Scenic Rivers	All river segments found suitable for designation (Appendix 3) should be recommended to Congress for inclusion under the Wild and Scenic Rivers Act. The following rivers/segments, found suitable by the WSR review, deserve special attention: Barrier Creek, Gordon Creek, Nine Mile Creek, Range Creek, Cane Wash, Green River, North Folk Coal Wash, Rock Creek, Coal Wash, Keg Spring Canyon, North Salt Wash, San Rafael River, Cottonwood Creek, Muddy Creek, Price River, South Fork Coal Wash	Please see general comment response #25
Mark	Belles	Wilderness	First and foremost I completely disagree with the Bureau's position, negotiated with the Administration, that no consideration will be given to the designation of new wilderness study areas (DRMP 1.6.14). I understand that the Bureau's position is in accordance with the settlement agreement for Utah v. Norton. Nonetheless I believe this settlement does not comply with the provisions of the National Environmental Policy Act and the Wilderness Act. I also understand that the Bureau will not change its position on this point. I simply wish to voice my opposition so that in the event a judicial judgment nullifies this agreement my objections are on record. Additional wilderness study areas for all lands that meet wilderness criteria should be designated.	Please see general comment response #108
Robert	Bennett	Socioeconomics	It is equally important that these agencies consider the concerns raised by the county where these designations are being considered. The concerns raised by Emery County include questions about the significance of the segments under consideration, whether the segments meet the standards of continually flowing water, questions over water rights and the availability of existing management options which could be employed to protect the river's values without being designated as Wild and Scenic. It is important to note, that the county depends heavily on natural resources to sustain its local economy and even the smallest change by federal land management agency can have negative impacts. It is my understanding that the concerns raised by the county have been forwarded to your office. I would strongly encourage you to give serious consideration to the concerns raised by the county.	BLM acknowledges and appreciates the concerns of Senator Bennett and those of Emery County. The BLM has coordinated with all cooperators to ensure affects of decisions regarding Wild and Scenic Rivers are appropriately considered. Careful consideration has been given to all steams with potential for Congressional designation into the National Wild and Scenic Rivers System to ensure that each meets all criteria for such a designation. Appendix C of the Proposed RMP/Final EIS explains the Wild and Scenic River study process. Section 4.6 of the Proposed RMP/Final EIS

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				evaluates the socioeconomic impacts of allowing or restricting use of BLM lands and resources. This includes the economic contribution (i.e. jobs, income, tax revenues, etc.) of energy production, recreation, and grazing on BLM lands for Emery and Carbon counties. The evaluation of potential effects of Congressional designation, including those on water rights, water related developments are also fully disclosed in the Final EIS. The Proposed RMP/Final EIS also analyzes management decisions for other programs which may eliminate potential limitations to the use of natural resource by local communities or resolve conflicts with other management priorities.
Robert	Bennett	Wild and Scenic Rivers	Emery County expressing serious concerns and reservations regarding possible Wild and Scenic River designations within their county. They have expressed concern that these designations could hamper development within their county and they believe that they do not meet the standards of suitability as a Wild and Scenic River.	Please see general comment response #86
Julie	Benson	Minerals and Energy Resources	I am concerned that some of the natural treasures found in the area such as Desolation Canyon, Nine Mile Canyon, and Muddy Creek will be destroyed by oil companies, off-road vehicles, or other development.	Please see general comment response #18
Julie	Benson	OHV Route Identification	I also think it is imperative that off-road vehicles use in these areas be limited to specific, well-marked trails.	Please see general comment responses #15 and #19
Jeff	Berg	Minerals and Energy Resources	Protect special places from oil and gas drilling, including: The Labyrinth Canyon corridor, Desolation Canyon roadless area, including Nine Mile Canyon, Horse Bench, Maverick Canyon, upper Rock house Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches; the Price River Wilderness Unit.	Please see general comment response #18
Jeff	Berg	Process and Procedures	Support the Castle County Heritage Plan - the citizen's alternative, which offers a solid balance between natural preservation and continued development and motorized recreation... no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that need protection include: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef.	Please see general comment responses #12, #35 and #144
Margaret	Bernens	OHV Route Identification	I further understand that the draft RMP is rather imbalanced in the designation of areas where ORVs are permitted and areas where they are not permitted. Such an imbalance will make it almost impossible for hikers and backpackers (like me) and other "non-motorized" recreationists to enjoy the incredible beauty of this area without the sights and sounds of ORVs. While I understand that you must provide areas for all types of recreation, I would urge you to protect from ORV use all designated routes within the Wilderness Study Areas and other special places within the America's Redrock Wilderness Act including Chimney Rock, Behind the Reef, The Price River Proposed Area, and the San Rafael Knob. Those of us who go to these special areas for rest, relaxation, and contemplation expect to be able to get away from the noise and smell of all types of motorized vehicles.	Please see general comment response #19
Margaret	Bernens	Wilderness	I understand that in the draft Price RMP some 98% of the wilderness-quality lands were left open to oil and gas	Please see general comment response #109

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			drilling despite the fact that US Geological Survey geologists estimate that the oil and gas deposits in this area would provide the country with perhaps a month of fuel. Surely a month's worth of fuel is not worth the real and possible degradation to the environment that oil and gas drilling can cause. Places like Labyrinth Canyon, Desolation Canyon, Nine Mile Canyon, Horse Bench, Pinnacle Canyon and many other places in the Price River Wilderness Unit are such incredibly spectacular and special places that to allow any oil and gas drilling there would be an absolute tragedy and completely irresponsible to the protection of our wild and scenic public lands.	
Joanna	Bettmann	OHV Route Identification	I am writing you to let you know that I think that designating every inventoried trail as a motorized route is an irresponsible and unacceptable approach to dealing with motorized recreation. I believe that the BLM needs to complete a comprehensive route designation plan within the Price Field Office that considers non-motorized users of public land, protecting sensitive areas that will be ruined by continued ORV use.	Please see general comment response #19
Craig	Bevan	OHV Route Identification	I have enjoyed the San Rafael area in my Jeep and on our ATVs... Closing and restricting travel in the San Rafael makes no sense to me. I am almost 60 years old now and there is no way I will be able to hike the area... Please keep the Chimney Rock Summerville and Humbug trail systems open. All of the popular OHV trail systems must remain open... The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan... Your BLM maps must be updated to accurately detail the OHV designations outlined in each alternative... One other problem you create when you close down areas is over crowding...This increases the chance for collisions. It is harder on the environment because of a larger concentration of OHV users in a smaller area.	Please see general comment responses #19 and #31
Jack	Bickers	OHV Route Identification	I ask that you be very careful to avoid indiscriminate closures of areas that were known and used by some even many years before your time. Such places as the Entrada Bluffs Road, Trin Alcove Point Overlook, Bull Bottom, etc were some of our favorite travels before BLM trained their sights on them as prospects for wilderness. These roads were made in grazing and oil explorations, and area wonderful, beautiful travels along the Green. We remember visiting Chaffin Ranch and big trees at the river where Major Powell's men camped. The "Gravel Humps" Trail to the river was a great one. Are you going to close it? Enclosed is a copy of "THE LABYRINTH RIMS - Sixty Accesses to Green River Overlooks", written 17 years ago. You might take a look at its maps and trails. In doing your maps and closures, please be specific, don't lead us in one end and block the other, or permit an impossible route and close a good one. Please be sure you KNOW these places, not just their locations on your big wall map.	Please see general comment response #19
Linda	Bickham	Wilderness	I feel the BLM management plan, as proposed, is not in the public interest. At the very least, the management plan must provide protection for the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. This acreage MUST be protected for the enjoyment of future generations from the destruction of oil and gas development and the ravages of off-road vehicle use. I urge you to alter the draft plan to include more meaningful wilderness protection.	Please see general comment response #111
Karen	Biesanz	OHV Route Identification	If all of these proposed routes are designated open for motorized use, 80% of the land in the Price District will be within one mile of a road. Opportunities for quiet non-motorized recreation would be greatly impacted and the proposed plan fails to offer a reasonable balance.	Please see general comment response #19
John	Bird	Paleontology	Our fossil resources are NON-renewable and after looking over your RMP I find little mention of their protection. I like the idea of identifying areas for fossil collecting so families can have fun learning about the past. But when it comes to development of gas and oil resources the alternatives available seem to let the "fox loose in the hen house".	Please see general comment response #91

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			Much of the area shown on the maps open for oil and gas development has been rich in vertebrate as well as invertebrate fossils. The Morrison formation is known world wide for it's rich abundance of late Jurassic fossils. The Cedar Mountain formation is unique in the world, providing new, never before known vertebrate fossils during a time period few fossils are known from. Other fossil rich formations outcrop throughout the San Rafael and surrounding areas. These resources NEED to be located BEFORE the heavy equipment moves in. It needs to be identified by professionals trained in identifying fossil resources and if need be steps taken to protect the fossils. Protection may mean removal of the fossils by those trained to preserve the scientific value or it may mean the drill pad or road be moved a short distance, or it may mean doing something else.	
John	Bird	Visual Resources	Another area of concern is the scenic value of the San Rafael Swell. The Swell is becoming a tourist attraction, with more visitors each year. The tourist dollar is important to local economies and as time passes will become increasingly more important. Tourists don't want to see gas and oil wells they want to see nature as untouched as possible. This is a tough problem, but one that needs to be more closely addressed.	The Draft RMP/EIS recognizes the scenic values of the Swell. The inventory class IV in the Swell has been changed to VRM class III in Alternative B and the Proposed RMP. The Proposed RMP/Final EIS analyzes various levels of visual resource protection and the impacts of protecting visual resources on other resources and uses.
Brett	Bishop	OHV Route Identification	I grew up in the San Rafael area and am very concerned about restrictions to access to public lands. Part of my family still live in Ferron and we plan trips to the area a much as possible. We are very aware of problems that exist with people misusing lands. I think we need to educate people more rather than just restrict areas. My family can not get around like they could before because of health problems so OHV access is very important to us. We are not the problem and always leave the area better than we found it. If there is more we can do let us know but please do not restrict me and my children from seeing the most beautiful parts of the state.	Please see general comment response #80
Scott	Bishop	Minerals and Energy Resources	It seems to me that lands are being proposed for oil and gas exploration that geologically have little chance of containing any useable amounts of gas or oil. Studies currently exist that show where these resources are most likely to be found and it seems they are being ignored in favor of simply getting as much money from interested parties as possible. Why not focus on leasing the lands around the areas already proven to have oil and gas rather than simply sell off the land because there are buyers willing to pay for it? It is very frustrating for me living in a state with so much natural beauty that is seen solely for what it can bring in dollars. I know that there are economic concerns that must be addressed, but there are also considerations above and beyond an area's monetary value that should not be overlooked. We have in our keeping uniquely beautiful lands we should be preserving for all people to see. These lands may lie within our borders, but they are too precious not to preserve for all who wish to experience them. While I recognize that we have many National Parks and Monuments, there are still many areas in danger of being lost forever if the present disregard for their uniqueness and beauty continues. Is it truly worth it to risk the destruction of archeological treasures in Nine Mile Canyon in order to allow oil companies to use thumper trucks to search for oil and gas that is not likely to exist there? Is it worth destroying wildlife-rich riparian and watershed areas so a few people can run their four-wheelers anywhere they please? Is it worth destroying the serenity of places like Dinosaur National Monument or Arches National Park simply because an oil company thinks they may find small oil deposits there? I submit to you that it is not. What we will lose will be so much greater than anything we may gain.	Please see general comment response #18
Scott	Bishop	OHV Route	I am not against responsible use of these vehicles on designated roads and ORV trails. What I am against is	Please see general comment response #19

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		Identification	allowing them what amounts to free reign on public lands. While I do enjoy occasional ORV use, I also enjoy being able to experience the natural beauty of our state without having to worry about being run down by some reckless ORV rider or being disturbed by the noise of engines and the smell of exhaust. Plans need to be put into place that consider all those who use Utah's wild lands, not just one group. Please do not take the easy way out and simply allow motorized vehicles on any path that seems big enough to drive on. Please consider those of us who prefer the sounds of nature rather than the sounds of engines just as much as the ORV users.	
Scott	Bishop	OHV Route Identification	What the state needs is a comprehensive system of designated ORV trails that are well marked and well published among the ORV community. These trails need to be marked and they need to be in areas that take into consideration those who wish to explore the wild lands of the state without the use of motorized vehicle. It is unfair to consider only the ORV users as the current proposed plan does. An ORV trail system needs to take into account the possible damage they inflict on an area and avoid delicate riparian ecosystems as well as other easily damaged areas. They also need to be kept out of proposed wilderness areas, especially those that are citizen proposed.	Please see general comment response #19
Shawn	Bishop	Transportation and Access	Please don't support any plan to close trails to vehicles.	Please see general comment response #10
Hugh	Bjarenson	Recreation	I enjoy riding mules as well as OHV's and hiking and find all activities necessary and extremely beneficial as to my and my family's quality of life... As a multiple activity user it appears to me that Alternative A would be the most fair of the alternatives. Although I think none of the alternatives meet the needs of the people who use this area... All camping areas that I see and use have been there for as long as I can remember and have been kept clean by the users or others who have followed behind. I feel that no further restrictions should be placed upon camping and I am strictly opposed to eliminating camping on the Wedge... Also after extensive review I noticed that I see no travel plan. As we see it, the whole inventory should be designated as open and in future go through proper lawful planning process to close routes with full public input and disclosures... We are also members of the South Eastern UT, OHV club. I know the club as well as Carbon and Emery counties have spent many day's GPS'ing and inventorying roads and trails. But I fail to see any mention of these trail proposals or an incorporation of said trail proposals in the DRMP... I feel the BLM should provide a clear and understandable travel map that is incorporated into the RMP with non-cents, as well as definitive explanations as to what exactly each alternative would do to the travel map. I am also appalled with the BLM for even considering putting any group size limits on large families or small clubs.... It seems to us that the Price BLM office does not want the American public to recreate on our lands within their jurisdiction and in particular motorized recreation... The lands within the PFO have been actively and productively utilized and protected by the people's of Emery County and this state for well over 150 years without apparently affecting there characteristics.	Please see general comment response #15
Keith and Lynn	Black	Minerals and Energy Resources	We must find oil alternatives for this country, not more drilling here!!	Please see general comment response #18
Keith and Lynn	Black	Process and Procedures	PLEASE PROTECT THE PRICE RESOURCE AREA!!! Please save this area for our country, there is so little left of peace and quiet. Please support the Castle Country Heritage proposal!!!	Please see general comment response #35
Heidi	Blankenship	Fire and Fuels Management	Page 2-53 fire management should be subject to the same restrictions regarding motorized travel as all other vehicles. Why isn't motorized suppression limited in areas closed to OHV use?	While motorized suppression is not limited in areas closed to ORV use, the action alternatives allow the Fire Management Plan to consider such restrictions as appropriate. BLM currently minimizes off-road travel with fire vehicles. Most of the areas where

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				the Price Field Office implements fire suppression are not suitable to off-road travel (steep terrain, cliffs, etc.) As such, off-road travel is quite rare.
Heidi	Blankenship	OHV Route Identification	It seems that route designation is occurring through the RMP in areas that were previously open to vehicle travel. On page 4-376 the RMP states that open areas and additional trails will be considered, but will the BLM still be able to close routes based on sound resource judgments? If so, perhaps there needs to be some sort of statement to the effect.	Please see general comment response #19
Heidi	Blankenship	OHV Route Identification	I like the fact that cross country travel will be significantly reduced however, on page 4-377, the following statement could be read in a manner which allows cross country travel for hunters: "including the use of OHVs for retrieval of game." This sentence needs to be rewritten.	The Proposed RMP/Final EIS makes no exceptions for hunting access. All recreational OHV use, including that for game retrieval would be required to follow all area and route designations.
Heidi	Blankenship	OHV Route Identification	Please DO NOT allow ANY cross country ATV travel except in areas which are already denuded by traffic and which are close to nearby towns.	Please see general comment responses #10, #12 and #19
Heidi	Blankenship	OHV Route Identification	If routes are to be designated in the Price River Unit of the field office, I would suggest that the BLM adopts alternative C and then adds other routes on a case-by-case basis. There are far fewer redundant routes visible on the Alt C Map than there are on any of the other maps, and this would give the BLM more time to review the routes in question and to make sound judgments before diving headlong into a route designation plan that allows roads over every square inch of land.	Please see general comment response #19
Heidi	Blankenship	OHV Route Identification	Perhaps the most difficult area to manage motorized use within the Price Field Office is the northern edge of the Mexican Mountain Wilderness Study Area. The Mexican Mountain WSA receives more abuse from OHVs than any other WSA in the PFO. It is for this reason that I highly recommend serious travel restrictions in the Box Flat, Devil's Hole, and Prickly Pear Flat areas. Allowing any cross-country travel in these areas would be extremely unwise.	Please see general comment response #12
Heidi	Blankenship	OHV Route Identification	Of all the possible routes and trails in the resource area, why are these trails (Summerville/Chimney Rock Trail System/Arapeen Trail) specifically highlighted for designation? Any why, if they are so important, isn't there a detailed map provided for our perusal?	Please see general comment responses #20 and #31
Heidi	Blankenship	OHV Route Identification	It's hard for me to believe that there will be "No significant Impact" with the designation of these (Summerville/Chimney Rock Trail System/Arapeen Trail) trails. Will not the designation of these trails result in a significant amount of popularization, thereby causing impacts to the resource, which will need to be addressed?	Please see general comment responses #19 and #20.
Heidi	Blankenship	OHV Route Identification	Why is "amplified erosion" predicted on designated routes on page 4-378 but not on 4-365? Will not an increase in traffic displace pronghorn populations in the area?	Page 4-365 of the Draft RMP/EIS analyzes impacts of ERMA management while page 4-378 analyzes the impacts of OHV use. The analyses are consistent because page 4-365 does state that there would be impacts to soil from uncontrolled recreation activities.
Heidi	Blankenship	OHV Route Identification	I don't understand the necessity of highlighting these trails (Summerville/Chimney Rock Trail System/Arapeen Trail), and because they have been emphasized, I think more information needs to be included about them in the RMP.	Please see general comment response #20
Heidi	Blankenship	OHV Route Identification	The PFO currently falls short with the monitoring and upkeep of trails throughout the resource area and must rely on the assistance of volunteers. How will the PFO find enough hands and time to maintain yet another motorized	Enforcement and monitoring will be part of a travel management plan that will be developed to

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			trail system? Where will the money and people-power come from for getting more law enforcement presence in the area to monitor compliance on the trails?	implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS.
Heidi	Blankenship	OHV Route Identification	Page 4-313: "OHV use will be allowed on designated routes in limited areas." Which limited areas? Should this not read: OHV use will be allowed on designated routes?	Areas where vehicles would be limited to designated roads and trails are shown on Maps 2-15 through 2-19 of the Proposed RMP/Final EIS. OHV route designations are shown on Maps 2-71 through 2-74. The text of the Proposed Plan/Final EIS consistently refers to areas managed according to open, closed, or limited to designated route categories.
Heidi	Blankenship	OHV Route Identification	Page 4-321 Alt D: states "Range Creek Jeep trail designated for OHV use to the lowest drill hole." This is fine for those in your office who know where this is (I am hoping that I do), however, for those who might know of a drill hole that exists within the WSA (is there one?), it might be wise to add a GPS locations here or at lease specify that this particular drill hole is 3 miles before the rock barricade/WSA boundary.	There is no drill hole in the WSA. The outcome of the final RMP and ROD will be a network of routes designated for motorized use that will be mapped, signed, and enforced. This map will be published and made available for public display and use. The marking of trails on-the-ground and enforcement will be part of implementation planned to begin after the ROD. These actions are beyond the scope of the Proposed Plan/Final EIS.
Heidi	Blankenship	OHV Route Identification	Page 4-483 OHVs will be limited to "inventoried routes." Well, that leaves a lot of room for interpretation. Why not limit them to designated routes instead?	The term "inventoried routes" was used to explain that OHV use would be limited to routes that have been inventoried within non-WSA lands with wilderness characteristics. The Proposed RMP/Final EIS states that OHV use will be limited to designated routes in these areas.
Heidi	Blankenship	OHV Route Identification	There is one main 2WD route headed into the Box Flat area along The Pack Saddle. This route sees a fair amount of use from the pack stock users and should be kept open beyond the corral to the point (this is at about 4328000 N, 0539000 E, but may be just a little bit further down the road). This is a natural, existing turn-around point which allows parking and is a good stopping point for non-motorized access to the WSA. Far too much cross-country motorized traffic within the WSA (including well-established trails that extend for miles and miles) occurs beyond this point. Several other routes leave this main route before the stopping point, some which might access campsites. These should be inventoried and a plan devised on their designation as deemed necessary.	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the route designations under the alternatives analyzed in detail. The road referred to in the comment would be open to the turn around under the Proposed RMP/Final EIS. Side roads originating from this road would be closed. Signing and marking of trails on-the-ground and adjustments to the routes designations will be addressed in a travel management plan as the RMP is implemented.
Heidi	Blankenship	OHV Route Identification	If any 4WD jeep route on the north side of the WSA is to be designated open, the one jeep trail that leaves Big flat from Dry Pond and heads south toward the West Fork of Red Canyon is the only one that should be considered. All other routes headed toward the WSA from this route should be closed.	Please see general comment response #19
Heidi	Blankenship	OHV Route Identification	All routes entering Prickly Pear flat from Big Flat should be closed for proper management of the WSA. If this seems too much for certain factions to bear, the route could remain open form Big flat to the Drill Hole at	Please see general comment response #19

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			elevation 6426, not including the route headed south from the drill hole (a route which heads nowhere and ends in a proliferation of routes: it should be closed to limit resource damage). Any other routes headed south from the cut-off route that do not immediately access stock ponds or suitable camping areas, should be closed.	
Heidi	Blankenship	OHV Route Identification	There is on road to the north of the Tavaputs Plateau, just after exiting Cottonwood Canyon (out of Nine Mile Canyon), that should be closed. The route ends for full-sized vehicles at a drill hole and becomes a rough 4WD route only accessible to ATVs thereafter. It is not crucial for its scenic values and there is not a lot of camping occurring there. The second route to the right should definitely be left open for scenic values and for the small amount of camping occurring alongside the route and at the end of it.	Please see general comment response #19
Heidi	Blankenship	OHV Route Identification	The cherry stemmed route from Woodside to the top of the Beckwith Plateau should either be closed completely or left open for all vehicles (not for the exclusive use of ATVs) until a determination is made for Wilderness designation. Access to the plateau is self-limiting. I wholeheartedly support the inclusion of the Beckwith Plateau as an ACEC in Alternative C and wish the idea would be extended to Alternative D as well.	Please see general comment response #19
Heidi	Blankenship	OHV Route Identification	There are several routes south and southeast of Smith Cabin (east side Mexican Mountain WSA) which are used primarily for camping, please take a look at these in your route designation endeavors and make sure that duplicate routes are not allowed.	Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. The impacts of continued implementation of the San Rafael Route Designation Plan are analyzed in Chapter 4 of the Proposed RMP/Final EIS.
Heidi	Blankenship	OHV Route Identification	It's hard to tell if the route to Cottonwood Wash (east SIDE Mexican Mountain WSA) is open or not. I would include it. The WSA does get accessed by motorized use there quite often, but it's become a popular non-motorized trailhead, which the PFO has few of.	Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. The impacts of continued implementation of the San Rafael Route Designation Plan are analyzed in Chapter 4 of the Proposed RMP/Final EIS.
Heidi	Blankenship	Recreation	Group size stipulations are a significant issue in the RMP. Although I do support group size limitations for the protection of resources, I think the RMP falls short at adequately addressing the issue. Page 4-370 lays out the limitations for organized groups, but what exactly is an organized group? "Organized group" most certainly needs to be defined.	Please see general comment response #81
Heidi	Blankenship	Recreation	25 is a good number for individuals, however there will be much worry over the vehicle size limit. Define "8 vehicles."	Please see general comment response #81
Heidi	Blankenship	Recreation	Group size and vehicle limitations, if they are indeed set for the protection of resources, why are pack stock limitations not addressed? I know for a fact that horses cause significant impacts, but there is no mention of the within the Group Size limits. Why not? Are pack stock considered a vehicle or a person or are they just not considered at all? Pack stock limitations also need to be considered for the San Rafael Swell SRMA, especially in primitive and semi-privative areas (2-75). I support the group restrictions under Alternative C, but again the	BLM has not identified specific issues with recreational horse use in the San Rafael. Group size limits and organized group requirements would apply to these users.

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			RMP falls short on imposing limits for a form of recreation that is very popular in the Swell. Please do consider horses.	
Heidi	Blankenship	Recreation	On page 4-342, Alternatives A and D state that pack stock use will be allowed throughout the SRMA and yet on Pages 4-348 and 4-352, pack stock limits are discussed in all of the alternatives. So, will use be allowed or restricted in alternatives A and D?	Use of pack stock would be allowed.
Heidi	Blankenship	Recreation	Something else that y'all may want to consider is the placement of reservation group sites in locations where horsemen typically camp. It might be wise to have pack stock specific group sites and, in turn, ATV specific group sites.	Please see general comment response #93
Heidi	Blankenship	Recreation	Why will competitive events be permitted in the San Rafael Swell SRMA? Why isn't maintaining "opportunities for primitive recreations and protect(ing) resources critical for existing types and amounts of non-competitive recreation use" important in the San Rafael Swell as well as other SRMAs as written on page 4-373? Why aren't these types of recreation as important in the San Rafael Swell?	Please see general comment response #15
Heidi	Blankenship	Recreation	Page 4-313: why is "leave No Trace" emphasized but not "Tread Lightly?" LNT was fostered for non-motorized travel. Tread Lightly should be included for motorized travel.	Please see general comment response #92
Heidi	Blankenship	Recreation	Page 4—316. Which rock climbing restriction is proposed? The RMP states that "rock climbing activities should be restricted based on…" but are they? Is the BLM proposing restrictions that will not benefit raptors or is it saying that we should (but may or may not) adopt restrictions that will benefit raptors?	Table 2-15 of the Proposed RMP/Final EIS states that: "Rock climbing activities will be authorized only in areas where there are no conflicts with cliff-nesting raptors."
Heidi	Blankenship	Recreation	Page 4-342: Why not encourage the use of fire pans and toilets in low use areas too? Encourage does not mean require. And shy not prohibit firewood collection everywhere in the resource area? I'm tired of seeing limbs cut off of living trees for firewood…especially in low-use as well as high-use areas.	Please see general comment response #93
Heidi	Blankenship	Recreation	Page 4:346 Alt D states that "additional campsites may be designated based upon monitoring of use-level demands…" on the Buckhorn/the Wedge/Mexican Mountain. Why won't this be allowed in the other areas (Temple Mtn. Head of Sinbad) as well?	Please see general comment response #93
Heidi	Blankenship	Recreation	Page 4-352 Alt D: How exactly would designation of large group areas "increase the availability of sites suitable for large group camping?" Seems to me that this would severely limit large group camping and concentrate it in specific areas.	Large group areas would provide large organized groups locations to camp without having to obtain an organized group SRP.
Heidi	Blankenship	Recreation	With the added workload that will come with imposing group size limits and group campsite area restrictions for the San Rafael Swell SRMA and PFO ERMA, why are staffing resources not considered in the RMP? Or are staffing resources considered elsewhere? Or is this just another thing that will slip by the wayside?	Please see general comment response #147
Heidi	Blankenship	Vegetation	Page 4-348 Alternative C does not make sense on the impacts to vegetation section.	Please see general comment response #163
Heidi	Blankenship	Wild and Scenic Rivers	How is it that Muddy has been eliminated from the alternatives? I am convinced that you cannot commit the San Rafael for Wild and Scenic River designation without committing the Muddy River, especially in the event that mere sections are being selected. Why has the Muddy been eliminated from the alternatives?	Please see general comment response #25
Heidi	Blankenship	Wild and Scenic Rivers	At the bare minimum, the Muddy from I-70 to the Wayne County line should be Wild and Scenic (it should truly be Wild and Scenic From I-70 to the Dirty Devil), or by a conservative standard, from Lone Tree Crossing to Salt Wash. At the very least, it should be deemed suitable based on recreational values.	Please see general comment response #27
Heidi	Blankenship	Wild and Scenic Rivers	The San Rafael should be deemed suitable from Fuller Bottom to the Green river, without exception.	Please see general comment response #25

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Heidi	Blankenship	Wild and Scenic Rivers	Both the Muddy and the San Rafael should be designated based on the merit of their wild and scenic qualities rather than on their recreational qualities. Why is one river supported and the other left out? From where is this inconsistency derived? The Muddy and the San Rafael are far too precious to let politics get in the way of the NWSRS determination.	The Price Field Office has carefully evaluated the suitability of all eligible streams, including the San Rafael River and Muddy Creek. Appendix C of the Proposed RMP/Final EIS includes a thorough discussion of how the suitability considerations are applied to each eligible stream segment. These considerations were used to develop a range of alternatives in the Proposed RMP/Final EIS, which included the evaluation of the San Rafael River and Muddy Creek as suitable (Alternative C). The BLM Proposed RMP in the Final EIS, based on these suitability considerations, does not find the San Rafael River or Muddy Creek to be suitable.
Michael	Bodenchuk	Process and Procedures	By this letter, I am requesting this office be involved in BLM Land Use planning within the state of Utah.	Animal Plant Health Inspection Services will be coordinated with during all BLM land use management planning efforts.
Michael	Bodenchuk	Wildlife and Fish	Further, I request WS be a cooperating agency in any land use planning effort conducted by the Bureau in Utah if wildlife damage management will be affected. This would include T&E species planning, wilderness designations, wildlife restorations and other wildlife management activities... I was therefore surprised to see the issue of predator control addressed within the DRMP/DEIS when we have not had any involvement with the planning process. I believe this is a violation of the MOU and the spirit of cooperation contained in CEQ regulations and the BLM's own rules.. With that as a background, I do not believe that predator control should be an RMP issue for the Bureau.. I would further submit that the actions expressed in the summary table under predator control for Alt A, B, and C are not decisions that can be made by the BLM Price Field Office, as they require amendment to the MOU. That decision is outside the scope of this document and should not be considered within the realm of possible alternatives. The only acceptable alternative is the language contained in the same table for the No Action Alternative and for Alt D, that is: "Follow Memorandum of Understanding (MOU) with Animal and Plant Health Inspection Service (APHIS)."	Please see general comment response #47
Robert	Boettcher	Wilderness	With regard to the RMP, I would like to go on record as opposing relaxation of rules that protect the wilderness areas, and in particular against opening up new areas to roads that are presently roadless, and against opening up any of this area to oil and gas exploration. The small amount of oil or gas to be found in these priceless wilderness areas could never offset the loss to present and future generations of Americans looking to experience some native wilderness. The remaining wilderness areas in the US are an endangered species, I fear, and I note that the BLM is now precluded from recommending any new wilderness areas anywhere in the country. Our precious wilderness resources cannot be squandered for the enrichment of a few, and to fuel our ever-increasing thirst for gas and oil. That time and money would be better spent developing alternative energy sources, rather than desperately invading our set aside wilderness areas to wring the last few drops of oil from them. Our children and grandchildren deserve better stewardship of our resources. Please help save the wilderness areas in Utah.	Please see general comment response #109
Doug and Peggy	Bogart	Alternative Maps	BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. We find this to be totally unacceptable. The OHV community deserves to be treated with respect. Your maps must be updated to accurately portray the OHV designations outlined in each alternative.	Please see general comment response #31 and #37

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			The plan indicated many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. However, most of the green lines on Map 2-56 are actually closed to unlicensed OHV use. How many miles of OHV routes on Map 2-56 are currently Illegal for unlicensed OHV use? There are many overlapping management "layers" in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet are not drawn along any recognizable geographic boundary making compliance virtually impossible. We the recreation public will not tolerate overly restrictive and impossible to understand restrictions on camping and vehicle recreation. We oppose all the management "layers" outlined in the draft plan.	
Doug and Peggy	Bogart	OHV Route Identification	We use our OHV to sightsee in the back country. We can no longer hike distances and depend on our vehicle to access these lands. We continuously find the roads being closed to OHV use, which we find unfair, as only those who can hike are able to enjoy the public lands. We spend a lot of time in Utah enjoying the BLM and Forest Service roads and trails, along with many others from our 4 wheel drive club, so we are concerned about the proposed management plan.	Please see general comment response #80
Doug and Peggy	Bogart	OHV Route Identification	The San Rafael Route Designation Plan will be incorporated into the new management plan, so the BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment response #20
Doug and Peggy	Bogart	OHV Route Identification	There is no justification for the kind of group size limits proposed in the in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment responses #19 and #81
Doug and Peggy	Bogart	OHV Route Identification	Popular OHV Trail Systems must remain open and two track 4 wheel drive trails must not be turned into trails 50" wide or less. The Chimney Rock/Summerville and Humbug trail systems should be left open to vehicle use as well as all existing roads and trails.	Please see general comment response #79
Robert	Bolton	Process and Procedures	Mr Johnson, your agency should not support discriminatory policies that seek to prohibit, or limit, all but backpackers from enjoying our wonderful backcountry that belongs to all our citizens.	Please see general comment response #1
Victoria and Kevin	Bond and Knutson	Transportation and Access	As we are all tax payers, we believe that public lands should be available for hiking, camping, and no impact airplane camping. The strips that we frequent include: Horseshoe Canyon, Mexican Mountain, Hidden Splendor, Angel's Point, Dolores Point and many others.	Please see general comment response #21
Mike	Bonnet	OHV Route Identification	While I do not propose it exclude motorized users from all BLM lands I do believe that they should be heavily restricted to areas near existing and preferably paved roads. Support the Citizens RMP proposal.	Please see general comment response #19
James	Boone	Minerals and Energy Resources	Please exclude oil and gas leasing and drilling from all lands included in America's Red Rock Wilderness Act. These activities are simply incompatible with the stunning scenery of this incomparable area.	Please see general comment response #101
James	Boone	OHV Route Identification	I'm writing to ask that you direct the Price Field Office to include others, and not just ORV users, in its comprehensive route designation plan. Every inventoried trail is not a motorized route, and it is unreasonable and irresponsible to consider them as such. Many areas in this district are proposed as Wilderness Areas, and ORV use in these areas is entirely inappropriate. There are over 2500 miles of motorized trails in the area managed by the Price office that are outside proposed wilderness areas. Surely this tiny part proposed for wilderness is not too much to remain ORV free.	Please see general comment response #12

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James	Boone	OHV Route Identification	Furthermore, it is important that the BLM designate specific trails in the RMP for off-road vehicles, and that the environmental and human impacts of these trails are minimized and fully analyzed in the EIS. In addition, "open areas" are a disaster from the word GO! They are nothing but an open invitation to obliterate the area in question. I see no justification whatsoever.	Please see general comment response #19
James	Boone	Process and Procedures	I have vacationed many times in the Red Rock country of Southern Utah, and I think it is fantastic! I am writing to endorse the Castle Country Heritage Plan as the preferred alternative for the Price Resource Management Plan. This is a good plan that protects lands included in America's Red Rock Wilderness Act and at the same time allows reasonable access for oil and gas development as well as off-road vehicles. I do not think any of the alternatives in the draft Price RMP meet these goals.	Please see general comment response #35
Jared	Borg	OHV Route Identification	I am an avid outdoorsman, spending most weekends in the out of doors recreating in many different ways. I cross country and back country snowboard, I hunt and fish. As a part of all these activities I use transportation such as my 4 wheel drive SUV (Toyota land cruiser) as well as a trail motorcycle and 4 wheeler. In following the Price Resource Management Plan I have been disappointed in the lack of input on OHV trails and roads. I definitely feel that much of the work being done is not benefiting all groups (all users of the land). Having lived in Utah for only 4 years I have seen most of the work of the BLM and state agencies as against OHV. Please realize that the clubs (UFWDA) and the (Blue Ribbon Coalitions) that I am a part of do alot to maintain the trails and area's we use. I personally have been on 7 organized trail clean ups. Members of these clubs do alot of work to make sure trails are marked (rockymountainextreme.com trail marking activities) and that users are educated. Please review the submitted trails by the UFWDA and consider leaving all of these open as well as maintaining them. 4 wheel drive vehicles allow families as well as other individuals who cannot see Utah any other way because of health restrictions or disabilities to enjoy our great state. Please Keep all trails open to motorized use and limit closing and restricting trails.	Please see general comment responses #19 and #80
John	Borg	OHV Route Identification	OHV Management and Route Designation: OHV recreation is identified as a major and increasing use of these public lands, but there is little consideration for providing a high quality experience. The route designation process seems to be geared toward limiting opportunity rather than giving the users an OHV recreation experience that's satisfying and encourages compliance. The criteria for OHV trail designation do not explicitly address the need for different types of routes by vehicle class (singletrack, ATV 52", or full-sized) and challenge level. As listed in the FAQ section on the Price RMP website, the route selection criteria are: - Eliminate duplicate routes - Provide access to dispersed camping areas - Avoidance of routes that impact cultural sites, riparian and T&E habitats, critical soils, ROS Semi Primitive Non-Motorized Areas - Protection of scenic values and historic features - Reduce user conflicts - Promote loop trails - Routes will not be designated in WSAs and ROS "Primitive" class.	Please see general comment responses #19, #20 and #79

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			While these criteria are necessary, they don't address creating high quality, enjoyable trail systems that are attractive to the OHV user and encourage better compliance. And focusing on these criteria alone may lead to an unworkable trail system. For instance, a "duplicate" route may actually be a needed alternative to get around a challenging feature. Some users will seek the challenge; others will want an easier way. Eliminating either can cause non-compliance. The "duplicate" routes may also be suitable for different types of vehicles. For instance, one may be a singletrack trail that is suitable and desired by two-wheeled vehicle users, and the other may be a jeep road for high clearance 4WD vehicles and ATVs. Having both routes reduces user density (improving recreational experience) and allows each user group to seek their desired recreational experience. While it is very desirable to have looped trail systems, the loops must be sensible and consistent to provide a high quality recreational experience. For instance, an ATV loop could be almost entirely very easy, but have one short section that is extremely difficult. Such a loop is mostly boring with one challenging section for an advanced user, and is generally enjoyable with a terrifying (or impassable, so the "loop" becomes an out-and-back) section for the beginner. By stacking or nesting loops, and wide variety of width and challenge level can be accommodated, but more information is needed. Trail systems that meet the users' expectations, and give them an enjoyable, satisfying OHV experience, reduces the tendency of users to create their own trails or ride closed trails/roads. The DEIS does not include route inventory information that's needed to develop a high quality trail system. Supplied Alternative maps are inadequate and do not indicate trail width (singletrack, ATV 52", or road & maintenance level/standard) or have route identification numbers/codes (for efficient commenting on the route inventory of designation of routes). If the PFO still wants to do route designation in the RMP, a complete inventory should be released in a supplement or new DEIS with a new comment period for route designation input. If the inventory information (that the PFO may have, but didn't publish) is incomplete, then a separate public process may be needed. Otherwise, it may be better to retain the No Action open areas in the Price River and San Rafael Desert areas. Another alternative would be to go with an interim "limited to existing trails" designation for areas going from "Open" to "Limited" OHV area designation outside special area prescriptions, and direct a tiered travel planning process to complete the inventory and designated routes.	
John	Borg	OHV Route Identification	For a complete and useful inventory: - OHV users should be contacted for input on difficulty and condition of trail/road segments, this could be done with trailhead surveys and from local OHV clubs/organizations. I'm sure local clubs would be more than willing to conduct on-the-ground inventory work with photographs and GPS track data. - Compile the inventory data in a way that it's useful - Maps need trail/road numbers or other route identification codes applied to each segment - Route width must be indicated on the maps. As an example: dots for singletrack, dashes for ATV 52", and solid for full-sized - Route difficulty should be indicated on the maps. As an example: green for easy, blue for more difficult, black for most difficult	See general comment response #19, #20 and #82.

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			- Tables listing each segment by identifying code with trail name if applicable, width class, difficulty, desirable features (what do trail users like about this segment: vista, wildlife viewing, challenge, changing scenery, …), segment length, issues (goes through riparian area), notes (could be re-routed to avoid riparian area), and any other information that will help make route selection decisions. This inventory information is needed up front to make decisions that provide a trail system with variety of experiences and loops by trail width, length of ride, and difficulty. I would strongly encourage your planners include Wernex, Joe, "OFF-HIGHWAY MOTORCYCLE AND ATV TRAILS: Guidelines For Design, Construction, Maintenance And User Satisfaction, Second Edition", 2002, American Motorcyclist Association as a reference for development of high quality OHV trail system.	
Nancy	Bostick-Ebbert	Wilderness	Many times through the years, we have hiked the San Rafael Swell and we have hosted many friends from out of state to enjoy these wild places with us. Wilderness quality lands play an important role, not just for wildlife or families like mine but for economic reasons as well. As wild places disappear, our rugged lands will continue to serve to attract visitors to Utah. Tourists do not come to see wells and pipelines or lands degraded by poor planning, they come because the beauty of the wild lands here in my home state are among the most spectacular in the lower forty-eight. Wilderness is multiple use---and poll after poll has shown overwhelming public support for wilderness protection.	Please see general comment response #109
Markay	Bouzaglou	Recreation	I hope this letter encourages you and others at the BLM to protect more wilderness and provide more clear and concise regulations for trail users. I appreciate the opportunity I have to explore this beautiful state of ours. Utah is extremely diverse in its beauty. I have been fortunate to enjoy mountain biking in Moab, hiking in Zion National Park, and I hope that we as citizens understand how important it is to protect places like these, as well as other wilderness areas. These places rejuvenate our soul and connect us to a higher power. John Muir once wrote 'the clearest way into the universe is through a forest wilderness.'	Please see general comment responses #15 and #36
Paul	Bowmar	Transportation and Access	As a pilot and member of the Utah Back Country Pilots Association I would like to see the continued use of airstrips in the RMP. Access by air is a zero impact to the environment method of using the land and it's resources. And all the pilots I know are very responsible in not damaging the environment or leaving trash or trails that cause erosion. I like hiking on day trips, and access by air is the only way one can go to some of these beautiful areas, hike and return home in the same day. Currently I am planning trips to several of the airstrips listed in the RMP for the summer of 2005. We appreciate including the airstrips in the Support/Transportation portion of RMP, and would like to see all airstrips in the area included.	Please see general comment response #21
Paul	Bowmar	Transportation and Access	We appreciate including the airstrips in the Support/Transportation portion of RMP, and would like to see all airstrips in the area included.	Please see general comment response #21
Brian	Brainerd	OHV Route Identification	I have just read with disgust about how ORVers are vandalizing areas in your district. I consider them like terrorists who have no respect for the law or public lands. Even though I haven't seen the RMP you released recently, I would like to say that I support the Redrock Wild Act that would restrict ORV use and mining and	Please see general comment response #12

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			drilling. It is an uphill battle with the evil of ORV crowds and an anti-environmental Bush administration to deal with.	
James	Brandi	Wilderness	America's Redrock Wilderness Act, that should be kept free of oil and gas drilling as well as off-road vehicles. A balance needs to be struck between wilderness areas and those used for oil and gas development and off-road use. The latter developments and use types tend to destroy wilderness character, erode delicate soils, and cause irreparable harm to natural and cultural resources... The lands which lie within your field office jurisdiction are unique. They should be protected either in their entirety or with regulations on those activities which can potentially harm the unique character of the various landscapes that exist in the field.	Please see general comment response #111
Andy	Braun	Minerals and Energy Resources	Protect lands in America's Redrock Wilderness Act from oil and gas leasing and drilling... it affects the land very negatively and with long term consequences. The water quality is degraded, the soil, which is very fragile is eroded. The wildlife habitat disappears.	Please see general comment response #101
Andy	Braun	OHV Route Identification	All trails should be designated by the BLM on whether OHV's can use them... use of OHV's off designated trails should be prohibited... the damage in these cases takes years to mend and encourages others to commit the same irresponsible acts... Certain trails should be designated in the RMP and the environmental and social impacts of these trails are minimized and fully analyzed in the Environmental Impact Statement. Please do not designate any trails included in the America's Redrock Wilderness Act for OHV's and especially not in existing wilderness study areas like Sids Mountain.	Please see general comment response #19
Andy	Braun	Process and Procedures	The Castle Country Heritage Plan is a balanced and fair plan because it protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATV's, motorcycles, and other OHV's, while still allowing these activities to take place under reasonable circumstances.	Please see general comment response #35
Leslie	Brazing	OHV Route Identification	It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment response #12
Leslie	Brazing	Wilderness	I am writing today to submit my comments regarding the Price Resource Management Plan draft alternatives and to endorse the Castle Country Heritage Plan... which is a balanced approach that protects lands included in America's Redrock Wilderness Act. This plan discourages oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. I endorse the use of non-motorized vehicles or other ideas which minimize the impact of these beautiful places bestowed on us. None of the alternatives described in the draft Price RMP adequately meet these objectives. I strongly urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #111
Steve	Bremner	Minerals and Energy Resources	Please do not offer citizen proposed wilderness lands to oil companies for development.	Please see general comment responses #36 and #101
Steve	Bremner	OHV Route Identification	I have personally spent much time on backpacking trips in all four seasons to Devil's Canyon, Rock Canyon, Hondu Country, San Rafael Reef, Cedar Mesa, Mussentuchit Badlands and the San Rafael River. They cannot withstand indiscriminate ORV use. At a minimum ORV's must be banned from this small segment of BLM land. Ideally, ORV's should be banned from all off-road use. Do not designate off-road vehicle trails outside of citizen proposed wilderness areas.	Please see general comment response #19

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Steve	Bremner	Recreation	Designate citizen proposed wilderness areas as semi-primitive non-motorized to protect them as such.	Please see general comment response #14
Doug	Brewer	OHV Route Identification	The step from "existing" to "designated" roads and trails was a terrible blow . . . In essence, it means that millions of square miles of ground became unreachable to us. It may as well be titled Wilderness Area. Exploring old mining roads and existing horse and cattle trails in this country was much of the enticement of the experience which has effectively now been banned. The solution is not closures, but instead openings. MORE choices of trails to decrease over-use and congestion and make more land available for all. Please leave open or re-open such areas as Segers Hole, Junes Bottom, the Molen Reef Road, Copper Globe Cabin to Kimball Draw, Saddle Horse and Bullock Draws, Virgin Spring Canyon, the single-track loop around Joe and His Dog, all of Cane Wash, Swasey's Leap, Old Woman Wash, Chimney Canyon, Muddy River gorge, the Chimney Rock/Summerville Trail System and the Arapeen Trail connector routes.	The San Rafael Route Designation Plan (2003) designated approximately 670 miles of routes for recreational OHV use, including four routes within the Sids Mountain WSA that are open on the condition that they continue to meet the WSA non-impairment standard. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. The impacts of continued implementation of the San Rafael Route Designation Plan are analyzed in Chapter 4 of the Proposed RMP/Final EIS. Also see general comment response #143 that deals with questions on the need to supplement the Draft RMP/EIS. Modifications to route designations will be considered on a case-by-case basis as activity level travel management plans are prepared.
Wes	Brewer	Transportation and Access	Please keep the as many OHV trails open as possible. I already believe their isn't enough. Especially single track trails for those who like to ride and enjoy the mountains peacefully. Our 2 tire trail bikes are very quiet and do not do any damage to nature. Please do all you can to help us in this issue.	Please see general comment responses #10 and #79
Zerin	Brewer	Process and Procedures	I am writing to encourage you to please insure that public opinion is portrayed correctly, that all voices & opinions are heard, and that decisions to regulate use on public lands takes into consideration the reason we have been blessed to have them... To establish wholesome, meaningful recreation activities to unite families, and enjoy God's creations.	Please see general comment response #142
Randy and Leah	Brightenburg	OHV Route Identification	The point of this letter is, so called environmentalists are no better than us OHV users. There are good and bad in every group and race. Punish the criminals whoever they may be and whatever there affiliation. If we heavily fine and prosecute those making new trails, leaving garbage and destroying public property, we can make a difference. Closing public lands only hurts the honest outdoor loving enthusiast. We need to teach all the generations to respect each other and our beautiful country. I even support taking away their OHV if caught destroying the land.	Please see general comment response #19
Randy and Leah	Brightenburg	Transportation and Access	Hello, I am sending this letter in hopes of making a difference. My husband and I are in our 30's, home owners, middle income and avid outdoor enthusiasts. We are tired of hearing about out of state organizations trying to tell us what is right for our state. SUWA and Sierra Club are narrow minded and one sided. I believe most of the people fighting for Red Rock protection have never seen it or really know where it is. (Other then somewhere in Utah) We regularly visit this beautiful area in our motor home with our dog and two off-road motorcycles. We also bring extra garbage bags and a large lawn rake to leave the area better then we found it. Closing public lands only hurts the honest outdoor loving enthusiast. We need to teach all the generations to	Please see general comment responses #10 and #19

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			respect each other and our beautiful country. I even support taking away their OHV if caught destroying the land. Please keep our public lands public. Please don't punish those who love the area and the beauty just for the sake of politics.	
Scott	Bross	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Clint	Brown	OHV Route Identification	The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50 vehicle group size limit. Dispersed camping is important to my family and friends. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with. Please revisit these issues and make the corrections that need to occur before the proposed travel plan can be considered balanced and fair.	Please see general comment responses #37 and #81
Deborah	Brown	Minerals and Energy Resources	Please do not allow oil and gas development	Please see general comment response #18
Deborah	Brown	OHV Route Identification	Protect them from off road vehicles as well. Please preserve what we have today. If we keep opening it up bit by bit to development there won't be anything left.	Please see general comment response #19
Evelyn	Brown	Process and Procedures	To think that this beautiful area would be sacrificed for the sake of what amounts to be a very small amount of oil and natural gas is unconscionable. The wild animals of that area will be wiped out if this goes forward and we've learned from many mistakes that when one species goes, the entire environment suffers. I implore you to please protect America's Redrock Wilderness! Please do everything in your power to ensure this land is protected and preserved in its current natural state.	Please see general comment responses #12 and #36
Rick	Brown	OHV Route Identification	I understand that the BLM plans to designate all minor documented paths in the northern half of your field office area as open to motor vehicles. I further understand that these paths are merely reclaimed mining routes, two-	Please see general comment response #19

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			tracks and wide cow paths. The effect of this poor action is to create a tangle of roads that go into nearly every WSA and proposed Wilderness Area in the north Price district. We need to protect these pristine Utah lands for future generations not give them away to a narrow interest, high impact group. We need balance in Utah land use. I believe ORV users should have places to go too. But the reality is their use is to the detriment of most all other users. They damage the land, pollute the air, and wreck the solitude for others. No other user hurts the experience of so many other users. Hikers, mountain bikers, backpackers, and horseback riders deserve a place to go without listening to shrieking engines and seeing an eroded landscape. There are over 2500 miles of ORV trails in the Price district that are not in WSAs. Isn't that enough? Can't we please have some balance in land use policies?	
Roxanne	Brown	Minerals and Energy Resources	I object to any oil and gas drilling would in the wilderness areas of Utah and especially in the Redrock Wilderness area.	Please see general comment response #18
Roxanne	Brown	OHV Route Identification	I also urge you to protect these lands from further damage from off-road vehicle activity. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment response #19
Nancy	Brown-Koeller	Minerals and Energy Resources	Since the Colorado Plateau is a national treasure, maybe even an international treasure, I believe there should be no oil or gas leasing in the Wilderness Study Areas. I also hope Nine Mile Canyon will have no further development.	Please see general comment response #101
Leila	Bruno	OHV Route Identification	I ask you to protect these fragile habitat and cultural resources from the destructive impacts of motorized travel; and urge you to set strong restrictions on ORV use so that they do not diminish the precious values of wilderness study areas	Please see general comment response #12
Amy	Brunvand	Process and Procedures	The new Price BLM plan revision should identify areas of outstanding scenic and recreational value, set them aside from oil and gas development, and protect them from abusive uses such as uncontrolled off-road vehicle use or destructive grazing practices.	Please see general comment response #1
Amy	Brunvand	Process and Procedures	I have seen a citizen's plan called the Castle Country Heritage Plan that maps the Price area with a far more reasonable balance between development and natural areas. It is clear that the Price BLM office has the information and tools to identify which areas within it's management scope are particularly valuable for non-motorized recreation and natural characteristics. I urge you to use these tools to re-write a plan that truly protects the valuable resources of wilderness, of natural ecosystems, of peace and quiet and in particular that protects the resource of a landscape that will surely do more for Utah's economic future with a legacy of beauty and opportunity for outdoors adventure than it ever could with scanty oil and gas deposits or being sacrificed to motorized thrill riding.	Please see general comment response #35
Amy	Brunvand	Recreation	The Draft RMP does not adequately identify or protect the natural landscape or areas valued by quiet, non-motorized recreationists. Some of the particularly valuable roadless areas have been identified by America's Redrock Wilderness Act. Hiking guides such as the ones by Steve Allen or Michael Kelsey identify routes that are especially popular for non-motorized recreation. BLM should use these tools as	Please see general comment response #15

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			well as public comments to identify non-motorized areas and protect them from further development and motorized incursion. For example, the Canyons that cut though the San Rafael Reef along the Goblin Valley Road and southward toward Muddy Creek are extremely popular loop hikes for day hikers and many are short enough for families with children. These should be protected for their recreational value, including keeping traffic off of the Behind the Reef area.	
Amy	Brunvand	Soil, Water and Riparian	Riparian zones and water sources are in special need of protection. For example, the channel of Muddy Creek has been claimed as a "road" buyoff-road vehicle users" even though motorized traffic clearly harms the aquatic system. The river dries up in certain seasons, which means that the remaining pools are even more valuable to desert wildlife. I have also encountered ATVs churning up the water in Salt Wash near Sid's Mountain. In Chimney Canyon, cattle have destroyed the spring at the canyon junction, but a hiker can easily see the beauty of the natural ecosystem that spring should support by hiking a bit further up the canyon where a drop-off stops the cows. Labyrinth Canyon and Desolation Canyon are irreplaceable resources for river runners. Oil and gas leases should not be allowed that will impact these river systems.	Please see general comment response #67
Amy	Brunvand	Wilderness	As I mentioned, there are clearly identifiable areas that have particular value for should preserved as natural and not be open to off-road vehicles or oil and gas leases. These include Wilderness Study Areas, river corridors and water sources, areas within America's Redrock Wilderness Act, and areas suggested in popular guidebooks for hiking, kayaking, horseback riding or other non-motorized recreation. These special areas are worth preserving for the future and it will be a tragedy if they are lost to thoughtless, short term planning.	Please see general comment responses #12 and #36
Jan and Judy	Brunvard	OHV Route Identification	We are writing to urge you to adopt the Castle Country Heritage Plan which we believe would best protect the Price River area, Nine-Mile Canyon, Sids Mountain and Desolation Canyon. We have seen so much destruction from irresponsible ORV use that we ask you to protect all the areas within the Redrock Wilderness Act from any further damage. Please do not designate any open areas where ORV use is allowed with no restrictions.	Please see general comment responses #12 and #35
Gaylene	Bruskotter	Minerals and Energy Resources	In order to become less dependent on foreign sources of petroleum and to establish ourselves as more self-sufficient, we need to be aware of the potential for responsible petroleum development within our boundaries. Please allow responsible development of our natural resources and decrease our vulnerability to 3rd world countries.	Please see general comment response #18
Marc	Bryson	Recreation	Another issue I've noticed in your published text is the limit on group size. I feel that 10 vehicles would be a little small. While I respect the intent of the ruling, I don't think limiting the number of vehicles would be the solution. I believe the type of travel is more important than the number of vehicles. Responsible groups, such as the U4WDA and Tread Lightly, teach low impact use and I believe the more people we can run through those programs, the better ALL of our lands will be respected. By limiting the group size, it reduces the effectiveness of these types of groups. These groups often spotlight various areas of the state to get people interested in going and seeing the local landscapes. The influence of tourism in our state is too significant for any local economy to ignore. If there were a 'trail system' or recreation area that could be responsibly managed, I can't imagine the impacts this type of use could have on a local economy.	Please see general comment responses #81 and #132
Scott	Buchanan	Minerals and Energy Resources	It has come to our attention that some of our protected lands such as our national parks are in danger of being developed for the purpose of extracting oil and gas. We are deeply concerned about this as the beauty and sacredness of our natural lands is part of what makes us proud to live in Utah. We petition you to protect our wilderness lands so future generations may enjoy them as we have, that we might now make the mistake of destroying what we can never have back. If we fight the oil companies, it will open the way of making alternative	Please see general comment response #18

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			fuels and power sources a reality. Why trade something so beautiful and eternal for something so temporary and unnecessary? Please don't sell out what we have inherited for something that can never be appreciated as much.	
Laura	Buelow	Minerals and Energy Resources	Please do not change Southern Utah by allowing oil companies to develop these precious lands. I support the citizens proposed wilderness areas to preserve the particular areas chosen.	Please see general comment response #18
Laura	Buelow	OHV Route Identification	I understand there needs to be a balance with ORV use, but the ORV allowed trails need to be marked and limited to protect the fragile ecosystem. Please help us to protect as much of this land as possible.	Please see general comment response #19
Kyle	Bundy	Minerals and Energy Resources	Our country needs more natural gas development, not more government regulations and exclusions. Please reword the Price District RMP preferred alternative and fix the areas that will hurt our economy... Oil and gas companies pay the taxes to improve our schools and libraries. The BLM has done an adequate job in the RMP to reflect this reality.	Please see general comment response #18
Steven	Burge	Minerals and Energy Resources	The Carbon County Commission requests that the BLM add into the environmental impact statement and further into the new land use plan of both the Price and Vernal Field offices, language that will allow both Carbon and Duchesne Counties access and allowance at no cost to the counties, to extract asphalt reserves that might be located on federal lands for purposes of road paving and maintenance of country roads.	Asphalt reserves, tar sand, and oil shale are leasable minerals. It is BLM's policy to make these materials available to the public and local governmental agencies whenever possible and wherever environmentally acceptable (see Draft EIS Maps 2-37 through 2-41 for areas closed to mineral material disposal due to resource conflicts). BLM sells mineral materials to the public at fair market value, but gives them free to states, counties, or other government entities for public projects. Asphalt, tar sand and oil shale are subject to the combined hydrocarbon leasing regulations, 43 CFR 3140, and cannot be disposed as a saleable mineral (mineral material) like regular sand and gravel. The counties would have to purchase leases for these materials according to the required leasing procedures.
Stephen	Burns	OHV Route Identification	I urge you, in adopting an RMP for the Price area to restrict vehicles to designated roads that are not in dispute under RS 2477 guidelines. In disputed areas, I urge you to adopt guidelines requiring the posting of “closed until posted open" signage.	Please see general comment responses #11 and #19
Dennis	Burr	OHV Route Identification	We do not like ideas that OHV recreation may be more limited, and we do not like the thoughts along the lines that we might have to get permission or a permit to gather together as a group when we go out on these public lands.	Please see general comment response #19
Cheryl	Burton	OHV Route Identification	I feel that vehicles should be restricted to designated roads and trails not only in these areas but in the whole state of Utah. Please consider a 'closed until posted open' policy in order to facilitate enforcement of restricted use. As well all routes should serve an identifiable and compelling purpose.	Please see general comment response #19
Cheryl	Burton	OHV Route Identification	Also consider the viewpoint of a peaceful coexistence between motorized and non-motorized groups so that there need be no conflict between these two groups by responsibly specifying and designating the use of these lands.	Please see general comment response #19
Erin	Buteau	Minerals and Energy	I am asking for you to take great care in protecting areas from activities such as mining and oil development.	Please see general comment response #18

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		Resources		
Erin	Buteau	OHV Route Identification	Care should also be taken to designate specific areas for ORV use so that citizens are able to recreate, but also protect the landscape and keep other areas free from noise and erosion. There are areas that are appropriate for these activities that should be clearly mapped so that users know where they are allowed to be.	Please see general comment responses #15 and #19
Cliff	Butter	OHV Route Identification	I am hoping that you when you the next RU27 study, that you take the time to consider important things like off-road vehicle use, environmental damage, and pristine beauty.	Please see general comment response #19
Stacey	Byers	Process and Procedures	The Castle Country Heritage Plan should strongly be considered because it protects lands (including America's Redrock Wilderness) from oil and gas development while at the same time includes reasonable opportunities for development to go forward in more appropriate places.	Please see general comment response #35
Jerome	Cain	Transportation and Access	In 2001 I visited Utah in my Aviat Husky aircraft staging out of Price, Utah and visiting several airstrips in the southeastern part of Utah including Mexican Mountain. Mexican Mountain is a unique and beautiful backcountry airstrip and should be considered a jewel among them. I am delighted that it will continue to be available. I also visited Happy Canyon, Mineral Canyon, Fry Canyon (for lodging), and Halls Crossing (for fuel). These backcountry airstrips are vital in allowing individuals such as me to visit the beautiful Utah backcountry with minimal travel time from our homes far away from Utah and also ease in quickly transiting from one area to another. Without this ability, it is unlikely that we would find the time to visit Utah and explore Utah.	Please see general comment response #21
Jerome	Cain	Transportation and Access	Pilots and their family and friends are an every increasing group of recreation enthusiast that relies upon these airstrips as their trailheads to explore the nation's backcountry. We are no different from other recreation enthusiast except for the mode of transportation we choose to gain access. Aviation, in fact, is probably the lowest impact form of transportation in that one airstrip roughly equates to one mile of road or ten miles of trail. Aircraft impact upon the soil is minimal in that no power is transferred through the wheels. As a rule, pilots fly out whatever they fly in. While aircraft do present some noise to the environment, that event is very brief and generally only occurs in the early morning or late afternoon in order to avoid the high density altitude associated with high temperatures during the mid-day. While the four airstrips that you have identified are ones of relative high use, there are others in you management area that I respectfully request be either mentioned in the Plan or that some sort of official language be included in the RMP to safeguard the future casual visitation of appropriate parts (airstrips) of the RMP area. Some of these airstrips are: Horseshoe Canyon Stone Cabin Gas Field Sagebrush Bench Cliffdweller Flat Gruvers Mesa Sweetwater Reef Temple Wash	Please see general comment response #21
Jerome	Cain	Transportation and Access	First of all, please do not close any existing backcountry airstrips. These airstrips and their usage have almost insignificant impact upon the environment when compared to other means of access and usage and our public lands. There are surely other locations that would be suitable for new backcountry airstrips. Airstrips provide access for all people from babies to the most severe aged and or handicapped. The greatest impact upon the	Please see general comment response #21

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			environment is a brief moment of noise not much different from over flying connecting jetliners. Aircraft primarily provide the means to access and depart in an area. The occupants spend the majority of their time on the ground. I refer you to the Utah Back Country Pilots for more information on the minimal impact by aircraft compared to other more accepted means of access and recreation on public lands. Again, please do not close any backcountry airstrips.	
Beckie	Cale	OHV Route Identification	I also ask that our lands be properly supervised as to how and when they may be used by operating vehicles. We must protect these wonders for ourselves and others to respect and enjoy.	Please see general comment responses #15 and #19
Beckie	Cale	Wilderness	I have seen some of the natural wonders and can not imagine them being ruined due to human disregard. Please do not offer these lands, our lands, to oil companies who will merely chew them up for their greed and short-term gain. What a devastation it would be to lose these works of nature.	Please see general comment response #109
Sarah	Callister	Minerals and Energy Resources	I understand that with growing conflict over dependence on foreign oil, many people are looking to decrease this dependence and are trying to find new places within our borders to drill for oil. However, please do not allow these precious lands to be taken over for this purpose. The benefits would be small and short-lived, while the sacrifices would be devastating and difficult to recover from.	Please see general comment response #18
Sarah	Callister	OHV Route Identification	Please designate specific trails for off road vehicles where their use will be less damaging to this fragile ecosystem and to protect the soil erosion and runoff. Make sure that trails are clearly mapped for those who use the land for this purpose and that the right measures of enforcement will be taken to ensure that the trails will be used properly.	Please see general comment responses #15 and #19
Sarah	Callister	Wilderness	proposed areas for protection are the San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek. Please protect these wilderness areas for us and those who will follow us.	Please see general comment response #109
Nancy	Cammans	Transportation and Access	This is a ridiculous idea that will kill family traditions and opportunities to enjoy our beautiful surroundings. Our children need to do more than Nintendo, movies, etc. They will always know who took it away from them. We live in a recreational environment, that would greatly suffer without recreational activities such as camping, mountain climbing, hiking, playing, and teaching respect and love for our country. Why don't you try taking the malls, movies, theatres out of the metropolitan communities, it would have the SAME effect!!!!!!!!!!!!! Leave it alone!	Please see general comment response #10
Becky	Campbell	OHV Route Identification	Asthma: If the back roads and trails are closed this is discriminating against those with such limitations. While stating that the San Rafael Route Designation Plan will be incorporated into the new management plan, it does not inform the public that other management "layers" will make significant road and trail closures. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan... BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. This is deceiving and will not be tolerated. The OHV community deserves to be treated with respect. The BLM maps must be updated to accurately portray the OHV designations outlined in each alternative. BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. Most of the 'green lines' on Map 2-56 are actually closed to unlicensed OHV use. There are nearly 100 miles of paved roads included. How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use? This is another deception and more misinformation for the public. The proposed management "layers" in the San Rafael Swell bring more discrete management restrictions that are not drawn along any recognizable geographic boundary and would make compliance virtually impossible. the recreating public will not tolerate overly restrictive and	Please see general comment responses #19, #31, #37 and #78

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			impossible to understand restrictions on camping and vehicle recreation. I oppose all management "layers" outlined in the draft plan. The existing popular OHV Trail Systems must remain open. All of the Chimney Rock/Summerville and Humbug trail systems should be left open. In addition to the existing trail system there should be designated links to the Arapeen Trail system. In fact all existing roads and trails should be kept open for vehicle use.	
Becky	Campbell	Recreation	There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands. Group size limits puts clubs, large families and the American public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts.	Please see general comment response #81
JayVar	Campbell	Recreation	I am a member of the Tri-State OHV club, headquartered in Hurricane, Utah, and have a number of concerns about your plan: The dispersed camping regulations that are being discussed Group size limits; Non-publishing of open OHV routes; as far as dispersed camping - this is a great family activity and a great opportunity for families, and OHV clubs, to join together to see this corner of God's creation. Group size - with the growing interest in ATV riding, especially amongst the older, retired people, such as myself, this would limit again, large family gatherings and club gatherings. Non-publishing of open OHV routes - the idea of closed unless marked open is totally ridiculous. As mentioned in my previous e-mail, the areas within the Price District should be reserved - but preserved as they are now - not closed unless marked open. Please consider my request in your decision making and let older people without hips and knees enjoy this country as well - after all, it's ours. We pay your salary.	Please see general comment responses #19, #80 and #81
JayVar and Marcia	Campbell	OHV Route Identification	Recently we obtained a copy of SUWA's "Watch" concerning your management plan. A quote from their "Watch" article stated, "nearly 80% of the public lands managed by the Price office are within one mile of a motorized route. Such an imbalance makes it difficult, if not impossible, for hikers, horseback riders, kayakers, and other non-motorized recreationists to escape the sights and sounds of ATVs, dirt bikes, and other off-road vehicles." In looking at the San Rafael maps that we obtained while there, there is square mile after square mile of closed to motorized areas. The 80% quote is grossly blown out of proportion. Another quote from their article says, "there are 2900 miles of routes for motorized recreation." After some research and questioning people in the Ferron area, we found that included in these 2900 miles are all state highways; Interstate 70; and all county roads, many of which are off limits to all OHV's.	Please see general comment response #19
JayVar and Marcia	Campbell	Recreation	Back to our idea of preservation: preserve what is there, please. Being of the age where knees are gone and old bones ache from the experience of many backpack trips, which were greatly enjoyed, the only way now for us to enjoy this back country is from the seat of an ATV. The hikers, horseback riders, kayakers and other non-motorized recreationists need their areas also. Looking at maps we have seen, those wilderness areas are all ready there.	Please see general comment response #15 and #80
Jerry and Becky	Campbell	OHV Route Identification	Junes Bottom is closed and we used to go there for outings, to take pictures, and relax, and walk around and look at the area where our ancestors lived. The trail along the Muddy below Hidden Splendor is closed and we used to enjoy going down it to view the canyon and have fun. There are so many places that are close that there is not enough room to describe them all. We don't like being so restricted in where we can go to camp and enjoy life. More restrictions are not right or fair and not the American way. You are taking away our freedom... We think a trail system should be developed that would make it possible to go from the Helper-Kenilworth area to the East Carbon area. There are already existing roads in this area that have been there for many years. The development	The issues regarding Junes Bottom, Muddy Creek and Hidden Splendor were resolved through the San Rafael Route Designation Plan of 2003. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require

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			of such a trail system would allow people of Carbon County to enjoy their actual backyards. There is some beautiful country in this area. Trails that would link areas in Carbon County to the San Rafael should also be developed. A trail system that would make it possible to make a loop without having to back track. With the proper education on maintaining and developing trails such as erosion control would be more beneficial to the area that closes off trails.	reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Table 2-15 in the Proposed RMP/Final EIS indicates that under the Proposed RMP route designations in the limited to designated category will be periodically reviewed and changes made based on resource conditions, changes in use, and other needs. Therefore additional trails could be considered in the future.
Ruth	Campbell	Wildlife and Fish	I hope that every effort will be made to provide a safe haven for all forms of wildlife that exist there and that horses, burros, wild dogs, ferrets, birds, fish, etc will not be endangered by too many sportsmen or miners/developers. I hope that whatever industrialization may occur there may be kept to an absolute minimum, that clean water and air may be preserved	Please see general comment response #40
Doug	Canady	Process and Procedures	Please revise the draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office. Especially the 1.5 million acres of spectacular land that is covered by America's Redrock Wilderness Act.	Please see general comment response #36
Barbara	Cangelosi	OHV Route Identification	Sacrificing our public lands to the noise, erosion, and scarring caused by ORVs is another concern of mine. The Bureau of Land Management has the responsibility to the citizens to restrict ORVs to specific, designated trails and enforce their use.	Please see general comment response #19
Barbara	Cangelosi	Wilderness	I strongly urge you to do whatever is in your power to protect citizen proposed wilderness areas... I want my children and theirs to enjoy the clean air and open spaces that have traditionally kept Utah distinct and unique as a national treasure. Please do not allow wilderness lands to be developed by oil companies for quick-fix economic answer to a long-range, complicated energy problem.	Please see general comment response #111
David	Carberry	OHV Route Identification	I've witnessed utter destruction of our watershed in Soldier Canyon due to out of control, unregulated ORV use. Local officials are unwilling or unable to assist us in curtailing or limiting this activity. I urge you to adopt the Castle Country Heritage Plan.	Please see general comment responses #19 and #35
Jim and Ginny	Carlson	OHV Route Identification	There should be no "open areas". All travel should be on designated roads. We expect that all roads that are designated for motorized travel would be signed. Incorporating into the RMP a policy of "all roads are closed unless signed otherwise" allows everyone to easily understand where travel is allowed and prevents vandals from removing signs, since once a sign is removed, the road is considered "closed".	Please see general comment responses #15 and #19
Rich	Carlstad	Process and Procedures	I would like to have the BLM consider the modification of the Castle Country Heritage Plan to allow for the more liberal use of the laws already in place for allowing the exploration for mineral, oil or natural gas. If any resources are found from the explorations the finder should be allowed the extraction of any economically viable resource, if the rules for the responsible extraction can be met. After any exploration, or extraction of the resource I feel that the area must be returned to the "pre existing natural condition" as part of the conditions imposed on the development, or exploration.	Please see general comment response #35
Jill	Carpenter	OHV Route Identification	I urge you to designate specific trails for limited off-road vehicle use, to strictly enforce the limited use of ORVs, and to help to preserve our public lands from noise, erosion and scarring caused by these destructive vehicles.	Please see general comment responses #15 and #19
Jill	Carpenter	Wilderness	I urge you to act to protect citizen-proposed Wilderness Areas in Utah. These areas are unique in the United States. They belong to all US citizens now and in the future, and should not be exploited for short-term gain. Do not offer these proposed Wilderness lands to oil and gas and mining companies for development. Please listen to	Please see general comment response #111

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			the needs of the larger populace and resist the local interests that have lost sight of the real value of these lands, interests that see only dollar signs or transient thrills in Utah's fantastic landscapes.	
Nancy	Carringer	Minerals and Energy Resources	I would like the BLM to protect and preserve wildlands in Utah by not allowing oil and gas seismic testing and drilling in America's Redrock Wilderness.	Please see general comment response #101
Nancy	Carringer	OHV Route Identification	I would like the BLM to protect and preserve wildlands in Utah by not designating off-road vehicle tracks in America's Redrock Wilderness.	Please see general comment response #12
Joan	Carter	Process and Procedures	The BLM's decision to modify the Price Resource Management Plan (RMP) fails to ensure such protection and favors those companies intent on drilling for oil and gas, and leaves unrestricted access to ORV and ATV traffic in the 2-million acre area under review. In addition, the research done by the Southern Utah Wilderness Coalition shows that protection is possible for this area while still allowing recreation, and I urge you to give the Castle Country Heritage Proposal your full support.	Please see general comment response #35
Scott	Carter	Transportation and Access	Without the use of an ATV or motorcycle they will never be able to carry sufficient supplies to get back to the places I have ridden to in the past on my motorcycle. These places are lost to them. They are places on a map that they have been denied access to. The proposed closures and restrictions in your management plan aren't protecting the land for my children, but in actuality they are taking the land away from them.	Please see general comment response #10
Chris	Case	Minerals and Energy Resources	Furthermore, the BLM has a duty to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. After all, the Bureau's place is to manage the land and not open it to industry. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear cougar and other wildlife they offer. Specifically, the BLM must protect these special places from oil and gas drilling: The Labyrinth Canyon corridor, Desolation Canyon roadless area, including Nine Mile Canyon, Horse Bench, Maverick Canyon, upper Rock House Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches; the Price River Wilderness Unit.	Please see general comment responses #12, #36 and #101
Chris	Case	OHV Route Identification	Still, I strongly urge the BLM to protect special places from the scars and damage caused by ORVs. There should, for example, be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that need protection include: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; The Price River proposed area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment response #12
Chris	Case	Process and Procedures	I would like to submit my comments regarding the Price Resource Management Plan. Thank you for allowing public comment on this important issue. The comments of citizens will hopefully help in the decisions to guide preservation and management practices for decades to come. The BLM should support the Castle County Heritage Plan--this alternative offers a solid balance between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Reed	Cass	Minerals and Energy	I think that the people of the USA benefit more from access to wilderness quality lands than they do from the development of oil and gas. I do not believe the untapped quantities of gas and oil in Utah are sufficient to impact	Please see general comment response #101

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		Resources	our dependence upon foreign oil or satisfy our energy needs.	
Reed	Cass	OHV Route Identification	By designating every single track in the sand as open to motorized vehicles, BLM fails to protect cultural sites, riparian corridors, delicate desert soil, wilderness study areas, and lands within America's Redrock Wilderness. I have taken hikes in the wilderness areas of UT and find that experience to be most calming and beneficial to my mental health and spiritual well-being. The hiking day enjoyment is severely diminished by ORV noise and physical damage to natural beauty of the countryside.	Please see general comment response #12, #19 and #36
Reed	Cass	OHV Route Identification	Off road vehicles should not be allowed in wilderness areas because of the damage to the terrain and the noise disturbance to others trying to enjoy the tranquility of the area	Please see general comment response #12
Rob and Mindy	Cassingham	OHV Route Identification	We can only plead with you to stave off more restrictions to the access of federal lands. We advocate open access to federal lands and condemn the already increasingly oppressive restrictions.	Please see general comment response #19
George	Cattermole	Process and Procedures	I urge you to adopt the Castle Country Heritage Plan. The plan is a reasonable compromise between oil, recreational, cultural and environmental interests.	Please see general comment response #35
George	Cecil	Minerals and Energy Resources	When is this massive onslaught against our precious wilderness areas going to stop? The Bureau of Land Management plans to sacrifice 98% of wilderness-quality land in some of the most beautiful high deserts in central Utah to oil and gas drilling and development. Yet the U.S. Geological Survey estimates that oil and gas deposits under America's Redrock Wilderness would amount to a mere 4 days worth of oil and less than 4 weeks worth of natural gas. To do otherwise will again destroy one of our few great remaining wilderness areas. Why is the BLM aiding in this unparalleled destruction for a few liters of oil and gas?	Please see general comment response #101
Kurt	Chaffin	Alternative Maps	These forms, such as ATV's, off-highway motorcycles, or Jeep style off-highway vehicles will be considered restricted from many of the routes currently proposed under the Preferred Alternative. Specifically review the map 2.56 to identify those routes that will legally allow unlicensed vehicles under the plan, and those that will not. A distinction needs to be made in that regard and a possible re-assessment to include more accessible roads and trails to unlicensed OHV's to replace those that currently do not allow unlicensed passage. Identification and disclosure are key factors for this.	Please see general comment response #31 and #78
Kurt	Chaffin	OHV Route Identification	The recent San Rafael Route Designation Plan has been a critical and useful process to help motorized recreationist identify routes and trails open to OHV's. It is understood, as mentioned, that the Route Plan will be integrated into the RMP process. However, even with this supposition, it appears that there are new 'management layers' found in the alternatives that would invalidate some parts of this Route Plan. It is important to accurately identify how these two factors interact with each other and disclose the potential changes, modifications, or even closures that would result from the Draft Plan. Surprise outcomes due to unintended management actions should not be allowed to inflict upon the efforts made during the San Rafael Route Designation Plan process. Therefore, alternative management strategies should be considered in order to avoid this from happening.	Please see general comment responses #19 and #37
Kurt	Chaffin	OHV Route Identification	The Draft Plan is proposing group size limitations. This is an unnecessary recommendation for the Draft Plan and should be re-evaluated for omission. Under analysis conducted during the San Rafael Route Designation Plan process, OHV uses at current levels do not cause significant impacts. Therefore, current group size standards continue to be sufficient and should be left in place. Alterations to these numbers will result in exclusionary situations for families, social groups, and clubs and put un-due regulations on reasonable recreationists.	Please see general comment response #81
Kurt	Chaffin	OHV Route	OHV travel takes on many different forms. While some forms, such as 4-wheel drive passenger vehicles, or	Please see general comment response #79

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		Identification	"Street-legal" off-highway motorcycles are allowed under Utah Law to travel on both off-highway designated trails or roads, and public roads or highways, I urge you to consider the other forms of OHV travel.	
Kurt	Chaffin	OHV Route Identification	I feel it also important to mention that the preferred alternative should allow existing trails and roads to remain open for use. In addition, every effort should be made to create and/or maintain linking trails and roads that can or will access the Arapeen Trail System.	See general comment response #19 and# 20.
Kurt	Chaffin	OHV Route Identification	Of greater importance is the Chimney Rock/Summerville Trail System. This system is important to OHV users and needs to be recognized on the OHV Route Designation Map. I am aware that local OHV users have spent significant time documenting this trail system with user input provided in the initial stages of this revision. However, this input has not been recognized within the content of the plan. It should not be overlooked in the management process. It is a critical opportunity for the public and the managing agency to identify reasonable recreational solutions. It would be highly preferable to create a supplemental publication to correct this situation.	Please see general comment responses #20 and #143
Kurt	Chaffin	Process and Procedures	There is an issue with the many layers of management designations that are proposed in this management plan. These layers appear to contain a variation of management restrictions or rules. Application of them can be wide-ranging or specific. However there are concerns about their interaction with other layers, and other potential problems and issues intertwined with their implementation consequently creating a difficulty of understandability. Strong consideration should be given to discarding this practice and clearing the alternative of such confusing strategies.	Please see general comment response #37
Kurt	Chaffin	Recreation	I am concerned that the Draft RMP process is working toward unnecessarily large restrictions and potential closures of areas/trails that are currently available public recreation 0pportunities.	Please see general comment response #81
K	Chausen	Minerals and Energy Resources	I would like to encourage you to keep as much of Utah's BLM land wild as possible. I'm concerned that the Price District Resource Management Plan may open more land to oil and gas leasing and hype. That you will protect this beautiful wilderness for future generations. We have a huge responsibility to leave as much of our land wild as we can for our children and our children's children.	Please see general comment response #18
Paul	Checonsky	Transportation and Access	First let me tell you that for me and my Family the Checonskys and as a member of the rattlers motorcycle club I would like to express my sincere concern for the new regulations that are trying to be implemented in your area. This is all of our land and as long as we use it and manage it wisely (ex. rotate trail usage. Open new trails, wile working with local groups including motorized and nonmotorized groups.) so every body can win. But shutting all the land down so only the unlawful will be using it is not the correct answer in my opinion.	Please see general comment response #10
Elizabeth	Cherniack	Minerals and Energy Resources	I deplore the Bush Administration's intention to open virtually all the BLM western land to oil and gas development	Please see general comment response #18
Elizabeth	Cherniack	OHV Route Identification	I would like to see the BLM prohibit cross country off road-vehicles completely.	Please see general comment response #19
David	Child	Socioeconomics	Social and economic impacts, BLM should place a high emphasis on both when considering the right choice for the preferred alternative. energy development industry is vital to our economic well being and should be encouraged in the RMP. I hope BLM will keep in mind policies that punishing or stopping natural resource development will hurt our community development efforts. Please approve an RMP alternative that allows for energy development.	Please see general comment response #132

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Richard	Christie	Minerals and Energy Resources	An important aspect in oil exploration and development which is neglected in your analysis is the likelihood of economically feasible oil or gas development on the public lands versus the other values already present there that would be damaged or lost by permitting the disturbances of exploration.	Please see general comment response #18
Richard	Christie	Process and Procedures	The best alternative available to you for reserving ecological integrity is the Castle Country Heritage Plan.	Please see general comment response #35
Dave	Christman	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes... Additionally, please make not of my strong desire to keep all OHV routes open... Non-profit recreational clubs are often an integral part of 'self policing' efforts such as the 'Trail Patrol' or 'Good Will Rider' programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as 'matching funds' for OHV grants, which are growing increasingly important to land managers as recreation budgets decline.	Please see general comment response #20
Dave	Christman	Recreation	There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D.	Please see general comment response #81
Kari	Christman	OHV Route Identification	My livelihood outside of work is almost entirely motorized recreation and as a result the travel routes in these areas are also part of my livelihood. I support multiple use of our public lands and believe that under proper and non-biased management, all types of use can coexist in this area... Also, I would like you to reconsider the group size limits. This unfairly subjects small and mid-sized clubs to the same special recreation permit restrictions as larger for-profit commercial organizations. I recommend that the BLM stay with the proven 50-vehicle group size limit. Many volunteer projects and volunteer hours that can be used for matching funds from the state will be lost if the proposed group size limits are imposed. Volunteer groups are essential to proper OHV management... Please understand the OHV use is a growing recreational activity and opportunities need to be created, not destroyed. It is essential to work with and not against the motorized community to develop a management plan that supports multiple use on our public lands.	Please see general comment response #81
Kari	Christman	OHV Route Identification	I have reviewed the DRMP and have found it almost impossible to understand. The DRMP is not clear and concise as to which roads and trails will be open for OHV use. The BLM must accurately disclose which routes will be open to OHV use in each alternative, as well as disclose all changes that each alternative will make to the San Rafael Route Designation Plan. I strongly oppose any additional road and trail closures in the planning area... Also I am interested to know what the BLM intends to do with the Chimney Rock/Summerville trail system as well as the Arapeen Trail connector routes. These trails do not appear on any maps in the appendix and it is not clear if the BLM intends to close these popular OHV routes. I recommend that all of these routes remain open to motorized recreation.	Please see general comment response #20
Kari	Christman	Recreation	Dispersed camping is also important to the OHV community and our families. It is impossible to tell from the DRMP which and how many dispersed campsites each alternative will leave open. Also there is no justification for the limits on dispersed camping, or the group size limits outlined in the alternatives.	Please see general comment response #81
Jerry	Ciolino	Minerals and Energy Resources	Under the plan, only 584,128 acres of the area would be closed to such drilling. Almost all of these acres are already protected from leasing by Congress.	Please see general comment response #18
Glenn	Clark	Transportation and Access	I would like to comment on the DRMP/DEIS for the San Rafael Swell. I am an avid outdoorsman and an avid ATV'er. I respect the land and its resources. I am not alone in this, there are very many more people who like me enjoy the land and enjoy exploring it with our recreational vehicles. I like many others, tread lightly and not scar the land.	Please see general comment response #10

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			There are those who do not respect the land and feel it is theirs to conquer, they are a small minority, and like anything else, those few do the damage and ruin it for all of the rest of us. This is so sad that people will do this, but what is more sad, is the fact that these lands are being closed off because of these sort of people, and we do not have the freedom to recreate in a responsible manner. I am not totally opposed to closure of land, I feel in rare cases it is necessary to protect what is wild. What is open at this time with existing roads should remain open; no more roads are to be made. Existing legislation states that an area at the end of the existing roads (at the end of an existing road), not the beginning as some have tried to interpret this meaning to be) are to be designated wilderness areas and no more roads can be built in these areas (from the end of existing roads), and existing roads are to remain open. Today I am saddened by the fact, (and more so I am angered by the fact) that people in government are taking it upon themselves to take my freedom and rights away, and do not give me the chance to be responsible in my recreational activities, rather than deal with the problems before them in a responsible way. Dealing with the real problem, managing the people who do wrong. Dealing with them in a righteous way when they are caught. And leaving the responsible land users, who are trustworthy of the land, to freely enjoy it in many ways, not just what certain individuals feel is appropriate. What is an important issue today is as is the case in all things in our society is, education. Teaching values to people so that they will be more responsible in how they behave, it is something that is slowly eroding away in our society. Today we just want to punish people in general as well as individually, rather than solve the problem through working it out. I see a lot of recreational clubs and organizations trying to do this, now days, because they know that through education we can bring about a change in people's behavior. I do see government doing this but it is very limited, and it is usually always overshadowed by the prosecute, and reprimand mentality that is so rampant in agencies today. These closures serve only to alienate people from the land and from the government. I feel, where there are existing roads, they should be left open. We should be concentrating our efforts on the truly wild areas, the existing road less areas, and keep them that way; and keep the existing areas with roads open to people to be free to be responsible in its use. Educate the public on responsible land use and prosecute abusers who do wrong. I ask you please to make a difference in working to a true solution to the dilemmas of land use, and protect our rights and freedoms as well as the land, in a responsible way. Keep the land open to all recreational users and managing it in a responsible manner that is right and justifiable. I will always do my part in this solution, wherever I can, as I am doing now. I lift this up in prayer as well, God bless you all.	
Greg and Linda	Clark	OHV Route Identification	In the very least, we are urging BLM to designate specific trails where ORV use is appropriate, preserving all other public lands from the noise, soil erosion, and scarring caused by ORV's. Please map clearly map and sign trails. Limit ORV use to these areas.	Please see general comment response #19
Kristin	Clark	OHV Route Identification	It also proposes further increasing Off-Road Vehicle access to the area although ORV use is known to damage the ecostructure and has interfered with other non-damaging recreational uses of Redrock.	Please see general comment response #19

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Madelyn	Clark	Minerals and Energy Resources	To offer proposed wilderness lands to oil companies for development would be very unnecessary. All they would be doing is ruining the wonderful landscape and making it ugly.	Please see general comment response #101
Zachary	Clark	Minerals and Energy Resources	I do not agree with any construction on this wonderful landscape, or any gases or minerals being taken.	Please see general comment response #18
Zachary	Clark	Wilderness	I want the citizen proposed wilderness areas such as 9 mile canyon.	Please see general comment response #109
Zane	Clark	Minerals and Energy Resources	Native American dwellings and art and are deeply concerned about encroachment into Nine Mile Canyon, Desolation Canyon, Muddy Creek, San Rafael Swell and other areas by gas and oil companies... designate specific trails where ORV use is appropriate and to preserve all other public lands from encroachment	Please see general comment response #18
Andrea	Clayson	OHV Route Identification	I feel the whole DRMP lacks credence. As we see it, you should designate the whole inventory as open and in future go through lawful process to close routes with full public input and disclosure. I and my family are also members of the South Eastern UT OHV club. I know the club as well as Carbon and Emery counties have spent many day's GPS'ing and inventorying road's and trails. I have seen no mention of these trail proposals or an incorporation of said trail proposals into the DRMP. When I attended the RMP meeting in SLC I was told that these trail systems would be implemented or considered. But as I read the information it is unclear if the proposals could possibly even be implemented under any of the alternatives. I feel there should be a clear and concise travel map to be incorporated in the RMP with a CLEAR and definitive explanations as to exactly what each alternative would do to the travel plan. In that time we have seen no proliferation or impacts other than those that were there when we originally started to frequent the area. We feel that this area should remain with an open designation. Open areas are needed where appropriate to accommodate the users who if for no other reason than, not to be dictated to have a place to go. We stay on the trails and believe in responsible recreation but we feel strongly in having the option to ride off the trail to retrieve trash etc.	Please see general comment responses #19 and #20
Andrea	Clayson	OHV Route Identification	With motorized activities being the primary recreation to visitors on the Price Field office lands, it seems strange to me then when I asked to talk to your OHV/motorized specialist at the SLC open house I was told there wasn't one. Considering the amount of users that use or are required to use motorized vehicles to access PFO administered lands it appears to be a grave oversight and speaks volumes to me of the importance of the motorized and disabled user groups to the Price Field office. To my knowledge the PFO has neither built nor opened any roads or trails in the Swell. I believe it is in the best interest of all user groups as well as your office to hire an OHV/Motorized specialist to add some balance to your staff. As well as possibly encourage the implementation and creation of a usable and enjoyable trail system.	Please see general comment responses #20, #80 and #89
Andrea	Clayson	Process and Procedures	My family and myself are extremely opposed to any new area being designated as ACEC, SRMA, VRM or ROS-NM. These designations are nothing more than attempts to circumvent court decisions as well as local planning and interests and is an attempt to eliminate motor vehicle use from our public lands. It is obvious to us and others who are on the ground a great amount of time, that based on the current amount of usage there is no need nor present legitimate demand for additional non-motorized areas.	Please see general comment response #1
Andrea	Clayson	Recreation	To me a Special Recreation Permit requirement for non-commercial activities is ludicrous and unwarranted. If a SRP were to be implemented you would be making criminals out of decent law abiding people and be even further driving people from enjoying our public lands. I feel that dispersed camping is the most valuable experience along with motorized access to utilize our experiences on lands within the DRMP. I also believe that all roads and trails should be open to non-street legal vehicles. Again you will make criminals out of good people. It seems to me that all dirt roads and trails, including the Wedge should be accessible to OHV travel and I am extremely against anything different. No camping restrictions should be implemented. I have not witnessed any	Please see general comment response #81

First Name	Last Name	Category	Comment	Response
			more camping spots popping up in the time I have been going there. For families such as mine dispersed camping and the camaraderie associated with it is what makes the experience. Is dispersed camping going to be eliminated in WSA's, ACEC, etc?	
Andrea	Clayson	Socioeconomics	As I have previously stated we have spent a considerable amount of time in the Swell and the surrounding communities. Nowhere have I seen anything that takes into account the economic impacts on the local communities that closing or further restricting motorized access or camping would have on those communities. It seems to me that the BLM should be required to consider and fully disclose and make understandable the economic impacts under each alternative DRMP.	The DEIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities. Due to incomplete data on recreational activities, the analysis was unable to quantitative estimate changes in jobs and earnings tied to recreation in the local area. The analysis was re-edited to further evaluate these impacts and is discussed in Chapter 4, Section 4.6 of the Proposed RMP/Final EIS
Brad	Clements	ACEC	Chimney Canyon and the Chute of Muddy Canyon are special places that need to be protected as much as possible. Grazing, OHV use, and mineral development should all be completely prohibited here.	Please see general comment response #30
Brad	Clements	OHV Route Identification	I hope the designated routes will have good signage and that appropriate enforcement actions will be taken to make sure OHV users stay on the designated routes, especially during the weekends in the spring and fall when the area sees the most use.	Please see general comment responses #15 and #19
Mark	Clevenger	Wilderness	Too often those of us who enjoy our hiking and camping experiences in these sorts of areas are assaulted visually and audibly by off road vehicles, drilling and mining. Wilderness is for the future, and allowing the type of extractional and recreational exploitation contemplated by the current Draft does not protect the future. Rather, it only allows development of extractive resources which will provide a few days to a few weeks worth of oil and gas at the cost of generations of waste to the wilderness areas. I firmly believe that all areas now contained in the proposed America's Redrock Wilderness Act should be protected from oil and gas leasing and industrialized development.	Please see general comment response #111
Elsie	Cobb	Minerals and Energy Resources	I am writing in hopes that my opinion might be counted concerning the Price Resource Management Plan when it is drafted. There are so many places in the plan area that are simply irreplaceable -- please don't let the Blue Ribbon Coalition and Big Energy determine their fate.	Please see general comment response #18
Elsie	Cobb	Minerals and Energy Resources	In particular I am opposed to any oil and gas leasing in this area -- such activity can only be a short-sighted (and desperate) attempt by the Bush administration to delay putting adequate resources into the development of RENEWABLE energy sources. We will never have another place like Utah. Please don't waste it for a few drops of oil.	Please see general comment response #18
Elsie	Cobb	OHV Route Identification	Also, I support a BALANCED use of off road vehicles on public lands -- and only where such use is limited to existing trails and can be monitored by the BLM, and where rules can be enforced. I know everyone has a right to recreate, but does everyone have a right to destroy the environment while they recreate? I don't believe so, and the evidence is clear that out-of-control ORV use is destroying our public lands in the West.	Please see general comment response #19
Michael	Cochran	OHV Route Identification	Nearly 80% of the public lands managed by the Price Field Office are within 1 mile of a motorized route. Such an imbalance makes it difficult, if not impossible, for hikers, horse riders, or boaters to escape the sights and sounds of ATVs, dirt bikes, and other off-road vehicles. Not only must OHV travel be strictly limited to existing and appropriate trails and roads, but unneeded trails should be closed and creation of new trails should be strictly limited and punished. To achieve the desired goal of recreational balance and protection of resource values, even stronger restrictions and area limitations must be imposed on motorized recreation. More areas should be	Please see general comment response #19

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			reserved exclusively for non-motorized recreation.	
Michael	Cochran	Recreation	Section 2.3.3 of the Draft RMP, as one of the Resource Uses, states that the RMP should "Provide for a wide range of accessible and highly desirable recreation experiences and opportunities for visitors and community residents while protecting other resource values." Unfortunately, the details of the Preferred Alternative do not provide for that possibility in that it is too heavily weighted toward motorized, specifically OHV, recreation.	Please see general comment responses #1 and #15
Michael	Cochran	Socioeconomics	Also, I find no rationale or justification for the objective to "Provide an environment for and encourage entrepreneurial activities," also stated in Section 2.3.3. No where else in the Draft did I see reference to statute or regulation providing for this abdication by a Federal land management agency. If this objective is predicated on the attention to socioeconomic impact promised in Chapter 1, this seems an unreasonable leap and even a giveaway on the part of the BLM. Repeated surveys have revealed a public preference for agency management.	The Proposed RMP/Final EIS and DEIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes a qualitative evaluation of socioeconomic impacts of changes in recreational activities and opportunities for private enterprises to assist the BLM in recreational management. A discussion of this analysis is provided in Chapter 4, section 4.6.
Michael	Cochran	Wilderness	Insufficient attention is given to the protection of wilderness-quality lands outside of current WSAs. More recent BLM reinventories and citizens' proposals like America's Red Rock Wilderness Act have shown there to be much undesignated pristine and special unroaded country warranting wilderness designation in the future. These lands are vulnerable to threats from both motorized recreation as noted above and from unrestricted mineral development. Again, one of the Draft's stated objectives is to balance mineral development with protection of other resource values. But if sufficient attention is not paid to these other resource values prior to hasty mineral leasing or unbridled OHV travel, the wilderness qualities of many areas will be forever lost.	Please see general comment response #111
Michael	Cochran	Wilderness	The key word in the objective is "balance," but the details of the Preferred Alternative do not provide this balance. The provisions in the Preferred Alternative for management of current WSAs that might be removed from that protection also fall short. Clearly these WSAs possess exceptional characteristics that originally resulted in that classification. Allowing activities such as OHV travel in those areas (if released) would quickly destroy those special resources. Again, the Preferred Alternative falls short in balance and protection of resources.	Please see general comment response #112
Christopher	Cokinos	Wilderness	I urge you to restrict ORV access within wilderness lands or those that are wilderness study areas. ORV access should be maintained on clear routes (after they've been studied for ecological effects) outside of wilderness lands. Free-form ORV access brutalizes the land--which, after all, we want to pass on to our children and our children's children.	Please see general comment response #144
Ann	Collins	Minerals and Energy Resources	We don't want to see trucks, tankers, holes, pipe lines, pumps, from oil and gas developers destroying our natural wonders, for speculative gain. Develop those places that are outside these wilderness areas, that already have permits.	Please see general comment response #18
Ann	Collins	OHV Route Identification	We want trails clearly mapped for our ORV's and we want enforcement to protect these landscapes. We enjoy our ORV's but we do not want to contribute to defacing any part of the wilderness with our noise, soil erosion and scarring caused by misuse of ORV's.	Please see general comment responses #15 and #19
Peggy	Collins	Cultural Resources	Add a new summary here, select a category, and if I have several points to make regarding off road vehicles, oil and gas exploration and development and archeological treasures, no further exploration or development of the nine mile canyon should be allowed.	Please see general comment response #9
Peggy	Collins	Minerals and Energy	I have several points to make regarding off road vehicles, oil and gas exploration and development and	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
		Resources	archeological treasures. no further exploration or development of the nine mile canyon should be allowed.	
Peggy	Collins	Minerals and Energy Resources	Add a new summary here, select a category, and if I have several points to make regarding off road vehicles, oil and gas exploration and development and archeological treasures. no further exploration or development of the nine mile canyon should be allowed.	Please see general comment response #18
Pat	Condron	Minerals and Energy Resources	The bill proposes 1.5 million acres in the Price plan area for wilderness protection. Yet this draft plan turns two-thirds of those lands over to oil and gas drilling, and wilderness is not even considered. We ask BLM not to allow any oil or gas leasing in the proposed wilderness areas	Please see general comment response #101
Pat	Condron	OHV Route Identification	We also ask BLM to declare the proposed wilderness areas closed to off-road vehicles.	Please see general comment response #12
Donna	Coomer	Process and Procedures	As a future resident of Utah I urge you to carefully consider the merits of the Castle County Heritage Plan for those who currently enjoy it's beauty, who want to and the wildlife and natural wonders that thrive there...thank you..	Please see general comment response #35
Lynn	Coray	Alternative Maps	We are alarmed as we hear of possible plans to close existing roads and routes. We feel that where current 4 wheel drive roads and ATV routes exist that they should remain open providing access for ALL of the recreating public. We were horribly disappointed last spring when we rode the Behind the Reef ATV trail to the Hidden Splendor Mine area and could not actually visit the mine sites because of the fences being so far from the actual site. Such sites should be easily accessible to all the public and not hidden from view. We understand the need to protect sites of such worth from a historical perspective. And yet, if such sites and areas are not accessible, then or what value are they. Please do not close the Chimney Rock/Summerville and Humbug trail systems. Please, could links be created to connect with the Arapeen Trail System. Please maintain the 10 Mile Wash trail as well as all other existing roads and trails. We are very appreciative that the 3 routes through the Sid's Mountain Wilderness Area have remained open.	Please see general comment response #31
Lynn	Coray	Process and Procedures	Please make your policies and maps clear to understand and supportive of Utah's family values. We oppose the hard to understand management layers" outlined in the draft plan.	Please see general comment response #37
Lynn	Coray	Recreation	We have enjoyed a multitude of activities in this wonderful area including hiking, mountain biking, Jeeping and ATV riding. We hope that those charged with the responsibility to care for this area will be vigilant in both protecting mechanical and motorized access to the area as well as its beauty. We hope that as our years increase, should our legs fail us, we might still have opportunity to enjoy the San Rafael Swell and other BLM lands with the use of motorized vehicles.	Please see general comment responses #15 and #80
Deanna	Corbitt	Minerals and Energy Resources	Let's make alternative sources of energy our goal rather than a very limited supply available at the cost of destroying our nation's natural treasures.	Please see general comment response #18
Violet and William	Corkle	Cultural Resources	As for Nine Mile Canyon, we would like to see the land swap pursued that is being contemplated by the Hunt Consolidated Inc, the state of Utah and the BLM. This would facilitate using the Sunnyside-Bruin route to the gas fields and allow the Nine Mile Canyon Road a much needed rest.	The Hunt Exchange proposal is outside the scope of the Price RMP. Currently the proposal is being examined in a feasibility report. If the decision is made to process the exchange a site specific

First Name	Last Name	Category	Comment	Response
				environmental assessment would be prepared and the public would be afforded opportunities to comment. BLM did review corridor alternatives for energy transportation in Nine Mile Canyon as was portrayed on Maps 2-51, 2-52 and 2-53.
Violet and William	Corkle	Minerals and Energy Resources	There doesn't seem to be any plan for where gas and oil drilling can take place, nor any plan for what trails off road vehicles must be restricted to, or what places will be protected for wilderness values. We question this reasoning when studies show that Utah supplies less than 1% of our country's oil and less than 2% of our country's natural gas. The studies also point out that under the surface of Utah there is 4 day's worth of oil for our country and 4 week's worth of natural gas for our country. We question this reasoning because there is available very sound scientific information to guide the evaluation process for sensitive areas.	Please see general comment response #18
Violet and William	Corkle	OHV Route Identification	Where's the formula for protecting the citizen's proposal wilderness areas outside the WSA's? The Price Revised Management Plan shows that the BLM has committed to a system of trails for ORV's. However, the plan leaves open the many illegal, user-created trails that are so detrimental to protecting Utah's wilderness. We're amazed that Devil's Racetrack, Five Miles of Hell and Behind the Reef Road remain open. Please guide the Price staff to accept responsibility and restore the proper formulas for managing wild lands.	Please see general comment response #12
Violet and William	Corkle	OHV Route Identification	Viewing the choices for OHV recreation by the RMP, all of the above beauties we have enjoyed will be at great risk and very possibly destroyed forever. Good management principles for OHV travel do not open every inventoried trail, cowpath, ranch access road up to OHV recreation. It just creates a maze of scars that covers the area from boundary to boundary and destroys the natural beauty and wildlife habitat.	Please see general comment response #19
Violet and William	Corkle	Wilderness	We feel that the best choices of plans are the Citizen's RMP Proposal and Alternative C. The designation of Critical Environmental Concern for the areas that possess wilderness qualities offers protection that special attention and tender loving management principles govern. We would like this protection applied to lands that possess wilderness qualities and have been designated as such by BLM and citizens groups. These lands should remain roadless.	Please see general comment response #141
Michael	Coronella	Minerals and Energy Resources	Your draft fails to strike a balance between preservation, recreation, and energy development. Instead, it favors a few special interests at the expense of the American public. It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions.	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.

First Name	Last Name	Category	Comment	Response
Michael	Coronella	OHV Route Identification	The decision to designate specific trails for off-road vehicle (ORV) use is laudable. But the draft revision leaves open far too many and closes far too few. Motorized trails would remain on more than 2 million acres. Such intensive vehicular use interferes with primitive and quiet recreational activities (such as hiking and horseback riding). And motorized use damages riparian areas and other wildlife habitat	Please see general comment response #19
Michael	Coronella	Process and Procedures	In addition, I write to ask you to support the balanced alternative, the Castle Country Heritage Proposal, that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests without precluding any.	Please see general comment response #35
Leonara	Cortez	OHV Route Identification	I do feel there is a need to protect our wilderness areas from ORV and visitors to the wilderness. There should be set up for ORV and other visitors to enjoy without destroying wildlife and land, areas closed until posted open, areas that are away from the noise of ORV.	Please see general comment response #12
Leonora	Cortez	OHV Route Identification	There should be set up for ORV and other visitors to enjoy without destroying wild life and land, areas closed until posted open, areas that are away from the noise of ORVs.	Please see general comment response #19
Adam	Cortis	OHV Route Identification	1. The purpose of the memorandum is to petition the BLM, Price Field Office to allow unfettered access by ATV/OHV/Snowmobiles to nearly 3 million acres in Carbon and Emery Counties. I personally petition the BLM, and the below-mentioned organizations also request the Bureau of Land Management continue to consider full-access use to the Price without further restriction to ATV/OHV owner/operators. I believe that the Price River Resource Area Management Framework Plan and the San Rafael Resource Management Plan could have become too restrictive to off-road enthusiasts. We believe that the new PRMP must correct this trend and ensure unfettered access to this area via motorized conveyances. 2.My particular case highlights the need for continued ATV/OHV/Snowmobile access to public lands - including the Price area. I consider myself environmentally conscious and had never owned an ATV or snowmobile. I am currently being retired from the military for medical reasons. I am severely disabled veteran. I can no longer cross-country ski or hike long distances and have sought alternatives to physical exertion so that I may continue to enjoy the outdoors. This year, I purchased a custom-made ATV that specifically addresses the needs of my disability, as well as a modified snowmobile. Motorized conveyances allow me access to Carbon and Emery country public lands that would otherwise be inaccessible. I also am a wildlife photographer and now need motorized vehicles to access remote areas. I have no other options. Although I mostly travel alone, using the area in the summer and winter, I also travel with large groups (10-25 people, re-unions, group organization trips, with 4x4 vehicles, tow rigs, & trailers with mountain bikes, more ATV's than horses etc.)... My constituents are particularly interested in preserving the 'Over-the-road' access to the entire 2.6 million acre area... 4.Right to Off-Road Access for Disabled (ROAD) is interested in ensuring that the BLM policy reflect and incorporate (especially within the Price Resource Management Plan) specific provisions from "American with Disabilities Act". It is critical to Utah's outgoing, outdoor enthusiasts - especially the disabled - that no further restrictions be placed on ATV/OHV/Snowmobile use of this area.	Please see general comment response #80
Kate	Cotterall	Minerals and Energy Resources	Do not sell our legacy of beautiful lands to Haliburton and Company.	Please see general comment response #18
Natasha	Cowie	OHV Route Identification	Also, please designate specific trails where ORV use is appropriate, and preserve other public lands from the noise, soil erosion, and scarring caused by ORVs. Opening public lands to many different users is important, but it is even more important to monitor land use and enforce regulations that ensure that human activities do not	Please see general comment responses #15 and #19

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			damage the environment.	
Natasha	Cowie	Wilderness	I urge you to protect Utah's citizen proposed wilderness areas, places like San Rafael Swell and Desolation Canyon. Please do not offer proposed wilderness lands to oil companies for development. Here on the Plateau, we are all too familiar with the effects of development and unsustainable methods of resource extraction - acres of our native hardwood forests are being converted to pine plantations, with a tremendous loss of biodiversity and wild areas. I fear that a similar tragedy may occur in Utah. Please preserve the areas now proposed for wilderness designation from oil and gas development to ensure that Utah's natural wonders remain pristine for the long term, rather than being squandered for short-term gain.	Please see general comment response #109
Scott	Coykendall	OHV Route Identification	Designating every inventoried trail as a motorized route is a responsible and acceptable approach to dealing with motorized recreation. The BLM needs to complete a comprehensive route designation plan within the Price Field Office that does not force ORV use into smaller areas thereby causing more impact on the remaining ORV use areas. Banning ORV use is not acceptable in the long term.	Please see general comment response #19
Michael	Coyle	Transportation and Access	I am writing in appreciation that the BLM staff has included wording for the continued use of the Mexican Mountain airstrip in the draft RMP. I have a friend and fellow pilot that has promised me a camping trip into the Utah backcountry, which he claims is among the most splendid places on this earth. As we live in California and work full-time, it would be impossible to make such a trip with the availability of airstrip trailheads such as Mexican Mountain. We make it a point to minimize our impact on the environment by flying quietly, removing all wastes, etc. I am also a pilot, and often find myself over inhospitable terrain. Backcountry airstrips are a welcome sight at these times as a safe diversion point in the event of rotten weather or mechanical problems. Thankfully, I have never needed to use one of these airstrips for either reason, but I appreciate their existence greatly.	Please see general comment response #21
Dave	Cozzens	OHV Route Identification	Off road recreation is growing in popularity, and brings great economic benefits to our communities. We need to encourage appropriate use of our public land, while protecting it from abuse. Trail systems are very desirable. Most of the riders I know will stay on a trail if they know a looped route they can follow and arrive back at the truck by dark. At trailheads/parking lots, small "tot lots" should be provided where riders too young to ride the trails can be supervised and learn riding skills needed as they venture out on to the trails. Those areas where such use is now occurring should be kept open for such use unless compelling circumstances require closing them. Of particular concern to me are the Dick Brass trails near Temple Mountain, and the Chimney Rock (or Humbug Trails). These trails have been built and maintained for twenty or more years, and provide a variety of challenging rides that bring people from all over the country, providing job opportunities to our communities. The Chimney Rock trail system is important for several clubs that use them for occasional races and competitions. I request that it be included in it's entirety for single track use. I request that the Orange, Green, and Blue Trails near Temple Mountain be opened to OHV use (maximum width 52"). Please allow the same use on the Lone Man Trail. The Purple Trail should be reinstated for single track use, as it provides essential loop access to the other trails in the system, and should not have been closed.	Please see general comment response #20 and #89

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			A BLM employee with off road experience would be extremely valuable to your office. Such a person would be able to relate well with motorized users, and would be able to identify strategies that would help with the overall management of our land. There is plenty of wilderness land available for recreationists who do not want to hear a motor in the outdoors. Any one who complains of motorized activity on legally designated roads and trails should be ignored.	
Dave	Cozzens	OHV Route Identification	Local economic factors need to be considered before any motorized routes are eliminated as such activity keeps us alive here in Southern Utah.	Please see general comment response #19
Dave	Cozzens	Recreation	Camping should mean more than changing neighbors for the weekend. As much as possible, existing historic campsites should be kept open for public use. None of the locals, and very few of our visitors want the expensive campsites that the BLM is now developing where popular dispersed campsites existed before.	Please see general comment response #81
Dorothy	Crandall	Minerals and Energy Resources	I encourage you to help all wildlands and wildlife lovers to protect the lands from the oil and gas companies who are destroying our treasures. Please do anything you can to help keep the BLM from offering our wilderness lands to oil companies for development. We need your help to keep them on open lands that have been approved for their development and their search for gas and oil.	Please see general comment response #18
Wes	Craven	OHV Route Identification	I've been in the high desert and seen the results of unrestricted use. Tire ruts everywhere. Erosion accelerated by these ruts cutting over hillside. And animal life? Gone. The areas are barren of life, thanks to the din of motorized vehicles, crushing tires and exhaust fumes.	Please see general comment response #19
Diane	Creighton	OHV Route Identification	Wouldn't it be great if vehicles of all types had designated roads, routes and trails to which they are restricted to, that are identifiable and have purpose to them. A "closed until posted open" policy to help enforce off-road vehicles from wilderness areas.	Please see general comment response #19
Diane	Creighton	Recreation	It would be nice to have areas for both motorized and non-motorized recreation, meeting the needs of both groups. I would love to have been in a designated area that was out of earshot from off-road vehicles.	Please see general comment response #15
Diane	Creighton	Wilderness	Most important, restrict routes in delicate areas of wilderness to preserve the wilderness characteristics. The beauty and wilderness of this area should be protected.	Please see general comment response #109
Philip	Croll	OHV Route Identification	This is to comment on the draft plan for the Price RMP. The area included has some of the most fragile and special land in the southwest. It is imperative that you provide maximum protection for these areas. I support the Castle County Heritage Plan--the citizen's alternative which offers a solid balance between natural preservation and continued development and motorized recreation. Please protect special places from the damage caused by ORVs. There should be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Also, please protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. I worked on an archaeological survey project in the southern Utah area many years ago, and know firsthand how fragile the habitats are and how inappropriate it is to allow ORV use and energy development. These lands should be protected for the future, not sacrificed for short term exploitation.	Please see general comment response #12 and #35
Chris	Crumal	Wilderness	I would suggest that you do not offer citizen proposed wilderness lands to oil companies for development. The	Please see general comment response #109

First Name	Last Name	Category	Comment	Response
			risk to the integrity of these wild lands is too great. I would also like to request that you designate off-road vehicle trails outside of citizen proposed wilderness areas. There's plenty of country out there that can be shared and off-road vehicles do not belong in unroaded areas that qualify as wilderness.	
Rich and Debra	Csenge	Minerals and Energy Resources	It is unconscionable that in the September BLM lease sale, thousands of acres in your district, especially along the Green River, were leased for oil and gas exploration, being the very same lands under consideration for protection as wilderness in S-639, America's Redrock Wilderness Act, pending in Congress.	Please see general comment response #18
Rich and Debra	Csenge	Wilderness	Surely there is enough land outside of that identified to have wilderness characteristics, upon which such activities can be undertaken. That goes for both mineral extraction, road building and ATV activities. Significant, large, roadless, unspoiled areas for quiet recreation and wildlife habitat must be preserved in your district, which shall be kept closed to exploitive industries such as mining, drilling and motorized recreation. Please let me know what measures you will take to rectify this inadequacy in the current draft RMP.	Please see general comment response #109
Loren	Cullum	OHV Route Identification	PLEASE!! PLEASE!! DO CLOSE THE SWELL TO USE. DO NOT EVEN TRY TO JUSTIFY CLOSING 25% TO 30% OF THE ROADS. THIS IS A TERRIFIC RECREATIONAL AREA AND SHOULD BE ENJOYED BY MYGRANDCHILDREN NOW NOT JUST BY THE ELITIST ENVIRONMENTALISTS.	Please see general comment response #19
Loren	Cullum	Transportation and Access	I am sending this out of concern for the decision that may be reached on closure of major portions of the San Rafael Swell. I have known the Swell all my life. I worked in uranium mines on the Swell during the late 1950's. I have since visited some of the mines in that area. I believe that the long term doom and gloom effects on the desert are greatly exaggerated. During the 1950's, as you now conservation was on nobodies mind. Yet much of the damage done in that area has completely disappeared. Much yet remains, but the desert has healed itself to a very large extent. I know there are some that wish the Swell were just as it was in the 900's. However, I believe many in that group would still not be happy--they would be upset by the damage being done by the Fremont People chipping away at the rocks. They say we need to preserve this area for our grandchildren--well I have grandchildren and the extreme environmentalists are trying to lock them out as well.	Please see general comment response #10
James	Culver	Alternative Maps	All popular OHV Trail Systems must remain open including the Chimney Rock/Summerville and the Humbug trail systems. Designate links to the Arapeen Trail System in addition to keeping all existing roads and trails open.	Please see general comment response #31
James	Culver	OHV Route Identification	I believe that the BLM should disclose all changes that each alternative may make to the plan. None of the alternatives are justified in the group size limits state. Also, maps should be updated to accurately display the OHV designations outlined in each alternative.	Please see general comment response #19
James	Culver	OHV Route Identification	I believe that the BLM should disclose all changes that each alternative may make to the plan. None of the alternatives are justified in the group size limits stated. The BLM should adopt the proven 50 vehicle limit and not impose National Park style management. Also, maps should be updated to accurately display the OHV designations outlined in each alternative. On the Preferred Alternative OHV Designation Map 2-56 most of the "green lines" are closed to unlicensed OHV use. How many miles of OHV routes on that map are currently illegal? I strongly disagree with multiple layers of management proposed by the BLM. To many restrictions are left to interpretation by the many managers involved. All popular OHV Trail Systems must remain open including the Chimney Rock/Summerville and the Humbug trail systems. Designate links to the Arapeen Trail System in addition to keeping all existing roads and trails open.	See general comment responses #19, #20 and #84.

First Name	Last Name	Category	Comment	Response
James	Culver	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use. The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative.	See general comment responses # 19, #20, #31and #37
James	Culver	OHV Route Identification	BLM's group size limits in all of the alternatives unneccessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for the true non-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50 vehicle group size limit... I oppose the management 'layers' outlined in the draft plan because the impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment responses #37 and #81
James	Culver	Recreation	It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation.	Please see general comment response #81
Nada	Culver	OHV Route Identification	We are writing to express our concern that the current version of the Draft RMP does not reflect the actual management alternatives that the Bureau of Land Management (BLM) is considering for off-road vehicles... As a result, public comment on this key issue will not address BLM's major decision to change its entire approach to management of off-road vehicles in the Price RMP. This is unacceptable and violates NEPA's requirements... Unless and until BLM corrects the alternatives shown in the Draft RMP, reissues the Draft RMP and provides the public with a new 90-day comment period, effective public participation cannot occur.	Please see general comment responses #19 and #143
Charles	Culwell	Transportation and Access	We travel by private plane, something we have been doing for a long time. The back country airstrips in your state are treasures for those like us who under normal circumstances would not be able to visit. We appreciate everything your agency has done for us.	Please see general comment response #21
Diane	Curewitz	Cultural Resources	I urge you to ensure that the rock art and prehistoric settlements lining the bottom of and sides of Nine Mile Canyon be protected from the direct and indirect effects of natural resource exploration and extraction. While alternative technologies could be employed to substitute for the energy resources found in the canyon, the cultural resources, once damaged, can never be replaced.	Please see general comment response #9
Cliff	Curry	Minerals and Energy Resources	The BLM should not allow short-term users such as oil and gas developers to create long-term impacts on our public lands.	Please see general comment response #18
Cliff	Curry	OHV Route Identification	The BLM should protect natural roadless areas against destructive ORV use.	Please see general comment response #19
Michael	Cussins	OHV Route	San Rafael Route Designation Plan : - It is unclear how the San Rafael Route Designation Plan will be incorporated into the new management plan.	Please see general comment response #20

First Name	Last Name	Category	Comment	Response
		Identification	- It does not tell the public that other management "layers" will make significant road and trail closures. - The BLM must accurately disclose all of the changes that each alternative may make to the San Rafael Route Designation Plan.	
Michael	Cussins	OHV Route Identification	Chimney Rock/Summerville Trail System: - The BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. - This is either an error or a deception and will not be tolerated. - The BLM must correct this inaccuracy. - The BLM's maps must be updated to accurately portray the OHV designations outlined in each alternative.	Please see general comment responses #20 and #31
Michael	Cussins	OHV Route Identification	Inaccurate Trail Designations on the Preferred Alternative OHV Designation Map: - The BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. - Most of the `green lines' on Map 2-56 are actually closed to unlicensed OHV use. - The BLM must disclose the accurate number of miles of OHV routes on Map 2-56 that are currently ILLEGAL for unlicensed OHV use? - The BLM must make the necessary corrections on map 2-56 to accurately portray the miles of actual, LEGAL for unlicensed OHV routes via the preferred alternative.	Please see general comment response #78
Michael	Cussins	OHV Route Identification	Popular OHV Trail Systems Must Remain Open: - All of the Chimney Rock/Summerville and Humbug trail systems should be left open. - The BLM needs to designate links to the Arapeen Trail System. - All existing roads and trails need to remain open for OHV use.	See general comment responses # 19 and #20
Michael	Cussins	Process and Procedures	Management "Layers" in the San Rafael Swell: The BLM has proposed many overlapping management "layers" in the San Rafael Swell. Each "layer" brings with it management restrictions. These restrictions are not drawn along any recognizable geographic boundary making compliance virtually impossible. I oppose all the management "layers" outlined in the draft plan. The BLM needs remove the overly restrictive and impossible to understand restrictions on camping and vehicle recreation.	Please see general comment response #37
Michael	Cussins	Recreation	Group Limit Size Restrictions: The BLM is proposing a severe change in group size limits. Group size limits puts clubs, large families and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment response #81
Eric	Dahl	OHV Route Identification	I ask you to limit ORV's to designated roads throughout the state. Getting away from it all in my mind is not complete without getting out of ear-shot from motorized vehicles. I'm not against ORV's, but I do think that motorized and non-motorized groups should enjoy adequate opportunity, and as I see it the former group seems to grow more popular with time unfortunately. If nothing else, all motorized routes should serve a compelling purpose.	Please see general comment response #19
Priscilla	Damon	Minerals and Energy Resources	I would like to go on record as opposing the opening of the Redrock Wilderness to oil and gas drilling.	Please see general comment response #101

First Name	Last Name	Category	Comment	Response
Kathleen	Dantonio	Process and Procedures	PLEASE PROTECT THE MAGNIFICENT REDROCK COUNTRY IN UTAH -- IF YOU HAD EVER SEEN IT, YOU WOULD NEVER DESTROY IT FOR A FEW BARRELS OF OIL. I PROTEST the Price Resource Management Plan draft alternatives. Please protect America's Redrock Wilderness! This beautiful landscape is a treasure that belongs to ALL American people. The BLM must consider an alternative that would protect the redrock wilderness' wild lands, wildlife and recreational opportunities. It failed to even consider whether any of the remote landscapes deserved permanent protection from oil and gas development. The CASTLE COUNTRY HERITAGE PLAN is a reasonable, well-balanced plan, and it should be adopted by the BLM.	Please see general comment responses #12 and #35
John	Dargis	OHV Route Identification	In the late '90s and early '90s, I ventured to the San Raphael Swell to hike, mt. bike and camp. As the years went on the numbers of motorized vehicles increased, which detracted from the experience. In my opinion, more vehicles should be restricted to designated roads throughout the whole state to avoid conflicts between motorized and non-motorized recreation.	Please see general comment response #19
Lois	Darnell	OHV Route Identification	Vehicles should not be allowed to stray off designated roads without a meaningful penalty. Similar rules should be applied to trails. In order to facilitate enforcement, there should be a "closed until posted open" policy. Opportunities for both motorized and non-motorized recreation should be provided. Conflicts between the two groups should be minimized or avoided.	Please see general comment response #19
Clayton	Daughenbaugh	Minerals and Energy Resources	There should be no oil and gas leasing allowed in Wilderness Study Areas, those areas previously identified by the BLM as having wilderness characteristics under the '202 process', or those lands included in "America's Redrock Wilderness Act".	Please see general comment response #101
Clayton	Daughenbaugh	OHV Route Identification	Indeed "closed unless marked open" should become the policy regarding all ORV use in the Price Unit. Certainly all ORV trails in designated Wilderness Study Areas of those areas included in "America's Redrock Wilderness Act" should be closed and enforcement increased.	Please see general comment response #12
Merrick	Davidson	Cultural Resources	I am concerned that the RMP's preferred alternatives leaves Nine Mile Canyon open to further industrialization. Allowing non-surface occupancy resource extraction in the area has great potential for damage to priceless Native American cultural and spiritual sites. Drilling under the ground toward the canyon bottom could disturb the known 10,000 petroglyphs, not to mention the areas of rock art which have not been discovered yet. Further, the full impact of Nine Mile Canyon to both visitors and Native people cannot be persevered by simply cordoning off known and highly visible rock art panels. Nine Mile Canyon holds remains of the full spectrum of life as lived by the Fremont and Archaic cultures, and later the Ute tribe, including pit houses and granaries. It is also of ongoing spiritual importance to the Ute and Pueblo people -to Native people, petroglyphs are not just "art" but a direct connection to their ancestors. Drilling should not be allowed anywhere near the bottom or sides of Nine Mile Canyon.	Please see general comment response #9
Brett	Davis	OHV Route Identification	I am especially interested in ALL ROUTES remaining open in the San Rafael Swell SRMA. Routes I have visited with my family are Fix It Pass, Eva Conover Road, Devil's Racetrack, Eagle Canyon, North and South Coal Washes, Swasey's Cabin (with the Swasey's as hosts), Behind the Reef Road and others in the Temple Mountain area that I am not sure of since I was in a group of friends and was more concerned with keeping my kids warm and dry. I do not typically support cross country travel, but I want motorized access to washes to remain, this is one of my favorite things to do, to drive up or down a bouldery wash, especially one that will see raging torrents of water rush through, completely changing the face of the wash. I have traveled historic routes like this near the city of	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			Price.	
Brett	Davis	OHV Route Identification	First, I find it curious that in the Route Designation Plan there are so many references to user conflicts between motorized and non-motorized users. I think many of these are either totally false or made up by so called "environmentalists" who are prejudiced against certain, legitimate forms of recreation. I have passed hikers, bikers, ATVers and others numerous times in the Swell and have rarely have had so much as a dirty look. Usually we stop and chat, and offer water or a ride. On some occasions, we have helped others with tools, and once completely rebuilt the front of an ATV.	Please see general comment response #19
Brett	Davis	OHV Route Identification	I agree with the need to balance use and access of backcountry routes with preservation and conservation. Unauthorized, duplicate routes, hill climbs, "cheater" go-arounds, etc. are unnecessary. I support the BLM in managing these problems. What I don't want to see are major trail closures. Alternative 1 is the only one that even remotely meets the needs of the growing segment of off highway enthusiasts. Creating more closures will only funnel the existing users into a smaller area, causing more erosion, more conflicts with people and wildlife, and creating more illegal trails. Second, I am specifically concerned about a few areas in particular. The road to June's Bottom is the first of these. Why this road was overlooked in your 1989 San Rafael EIS/RMP is a mystery to me. This is a historical access route built in the 1930's by the Marsing family that continues to be used today. Yes, it is the actual route across slickrock built by the Marsing's. A description of the route appeared in "THE LABYRINTH RIMS 60 Accesses to Green River Overlooks" by: Jack Bickers, (4-WD Trailguide Publications 1989). It also appeared on previous BLM travel maps. To ignore this route just to promote a Wild and Scenic River designation is not acceptable. The second route is the Muddy Creek route through the Reef. Again, this is a historical, long time road. The erosion damage caused by current use is temporary and inconsequential. On page 28 of the route plan, it states that the route through this canyon is confined to the stream bed and the flood plain. Why is the BLM worried about damage to a flood plain? A flood plain by definition is a massive area of erosion. Regular flash floods do more “damage” than a few vehicles ever could; I don't see the BLM trying to stop flash floods. This is either a non-issue drummed up by those who don't like motorized vehicles, or a poor excuse by the BLM to remove vehicle use so as to welcome a Wild and Scenic River designation. Finally, I am concerned about the Devils Racetrack/Eva Conover routes and the Behind the Reef Road. They provide backcountry access at its finest! It would be a shame to close these scenic trails.	The analysis of Alternative E in the Proposed RMP/Final EIS points out that limitations on areas available OHV use could lead to crowding and impacts on the areas available for use. The issues regarding Junes Bottom and Muddy Creek were resolved through the San Rafael Route Designation Plan of 2003. The San Rafael Route Designation Plan is carried forward as common to all alternatives. The Devils Racetrack/Eva Conover routes and the Behind the Reef Road are designated open in the San Rafael Route Designation Plan and would therefore remain open in the Price RMP.
Brett	Davis	OHV Route Identification	I would like to see all pre-existing routes in WSA's reopened as well. The roads that approach the San Rafael River at the Lower Black Box should be open, as should the Upper Black Box Road to Mexican Mountain. To call these dead-end roads that “don't go anywhere” is silly and subjective. Of course they go somewhere, even if that somewhere is the end of that road. In addition, they provide needed access to the San Rafael River.	The issues regarding the routes identified in the comment were resolved through the San Rafael Route Designation Plan of 2003. The San Rafael Route Designation Plan is carried forward as common to all alternatives. Also see general comment response #143 that deals with questions on the need to supplement the Draft RMP/EIS. Modifications to route designations will be considered on a case-by-case basis as activity level travel management plans are prepared.

First Name	Last Name	Category	Comment	Response
Brett	Davis	OHV Route Identification	The Swell is in desperate need of a well thought out, well-implemented travel plan. The key to helping people follow the plan is education. Kiosks and signs need to be placed to encourage proper trail etiquette, but most importantly, we need to have accurate, truthful maps available! The Swell desperately needs a system of trails for all skill levels. Designated loops trails and longer one way trails that go to a historic place or natural site will keep users interest and encourage people to stay on designated routes.	Please see general comment responses #15 and #20
Earl	Davis	Transportation and Access	Because of my age and age of spouse proposed changes in access and activities will prohibit as from much of the area considered.	Please see general comment response #10
Jeff	Davis	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Kathleen	Davis	Wilderness	I urge you to protect these wilderness areas from damage by off road vehicles. No designated routes should be on the lands within the America's Redrock Wilderness... Any damage to these lands will take centuries to repair. The fragile ecosystems can not tolerate the repeated damage from these vehicles. I urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling and industrialized developments. The oil and gas from these areas is limited and does not justify the potential hazards that come with this development.	Please see general comment response #111
Paula	Davis	Wilderness	The Wilderness Act of 1964 stated that 'A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain...' I am asking that the BLM protect citizen proposed wilderness areas. I realize that it will be up to you and your organization, through the Price RMP, to protect areas like the San Rafael Swell, Nine Mile Canyon, Muddy Creek and Desolation Canyon and I want you to know how people of Utah feel about these areas. Wilderness areas are important because they provide long-term protection to the last of our nation's wild country, country that contains spectacular beauty, maintains spiritual values, supports native plants and animals, and provides opportunity for primitive recreation. I have read that although 80 of the wilderness study areas (WSAs) could contain oil and gas there is a low likelihood of finding deposits of developable quantity. Given that data, I would ask that you preserve these wilderness areas so that our natural beauty and wonders will not be squandered for short-term, speculative gain. It is obvious that no matter how much oil and gas is discovered, this is not a renewable resource and it behooves us - as residents of Utah and as citizens of the world - to put our time, money and energy into developing renewable resources. These same areas need to be protected from off-road vehicle use. There is no reason why trails cannot be provided and designated for those who wish to use these vehicles-trails that are clearly mapped and signed with enforceable rules as to where off-road vehicles are allowed. The world is big enough for all of us but needs to be protected and preserved so that it will exist for generations to come.	Please see general comment response #109
Michael	Decker	Minerals and Energy Resources	I am writing this message as a concerned citizen that has the task of working in an industry that is trying very hard to meet the energy demands of our country. These natural gas resources will play a critical role in meeting those demands. Natural gas development is key in helping the country meet its increasing energy requirements in an environmentally sound manner. The energy industry has made great strides in improving its operations to mitigate the development challenges. I believe that energy development can coexist and that adequate	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
			regulations are in place through the existing permitting and regulatory process to ensure safe development of the vast resources within this area. Resource development provides high paying jobs and significant tax revenues to the federal, state and local governments. I trust that you will continue to manage these lands as multiple use areas that allow us to meet the energy demands of this country. Thank you for your time.	
Richard	Deegan	Minerals and Energy Resources	Please don't let Utah's beauty be destroyed by the proposed oil and gas drilling.	Please see general comment response #18
Carol	DeFrancia	Wild and Scenic Rivers	I am concerned with proposed drilling activities along river corridors (specifically Desolation Canyon) and other highly treasured wild and scenic areas. Visual impacts and negative environmental and cultural impacts in these areas need to be closely examined and reevaluated within a longer-term assessment (30 days may not be adequate.) Drilling for whatever scant oil may exist under these scenic wonders may be the priority of the current Administration, but it is not what most locals in our area, or visitors from other states or countries, wish to see. By opening up our scenic "watershed" to industry, we are sacrificing our local tourist economy to enrich the pockets of a few mineral speculators. The scenic redrock wilderness surrounding our community is our number one economic resource. There are places where drilling may be appropriate, but not along our river corridors or other pristine areas which should be protected at all costs and preserved for our children, and future generations to come.	The Proposed RMP would afford protection of the Green River corridor, especially through Desolation Canyon, by the finding four segments suitable and continued management of the Desolation Canyon National Historic Landmark, the WSA, the SRMA, and proposed management for VRM class I, and limitations for mineral development along the river corridor.
Robert	DeGroot	Minerals and Energy Resources	We disagree and offer the following specific suggestions to fully protect wildlife habitat: Oil and gas leasing should be prohibited in all areas that are proposed for wilderness protection in 'America's Redrock Wilderness Act"	Please see general comment response #101
Robert	DeGroot	OHV Route Identification	Off-road vehicles should be prohibited in all areas proposed for wilderness in the Redrock Act.	Please see general comment response #12
Patricia	Dement	Process and Procedures	Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands. Please let your conscience be your guide...not your wallet.	Please see general comment response #35
Mr and Mrs James	Denison	Minerals and Energy Resources	It is a direct violation of the BLM's own "multiple use" mandate, to make oil and gas development a priority over all other values as the Bush Administration has instructed.	Please see general comment response #99
Mr and Mrs James	Denison	OHV Route Identification	These travel plans should implement effective and frequent monitoring of ORV impacts; set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs; and plan and budget for adequate enforcement of travel plans. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, the BLM should not allow ORV use.	Please see general comment response #19
Mr and Mrs James	Denison	Process and Procedures	It is important that all resource values should be considered equally, including wilderness, riparian habitats, wildlife, cultural resources, non-motorized recreation, fisheries, visual resources, water quality, air quality.	Please see general comment response #1
Mr and Mrs James	Denison	Process and Procedures	The BLM should refrain from offering oil and gas leases in proposed wilderness areas, and to designate special protection in the RMPs for proposed wilderness lands. The BLM should keep oil and gas and ORVs out of areas proposed for wilderness.	Please see general comment response #36
Mr. & Mrs. James	Denison	Wilderness	We are among the millions of Americans who, over and over, travel great distances to visit and enjoy the very special wonders of the Redrock areas. It troubles us that this unique and spectacular wilderness area could be destroyed by mismanagement--allowing oil and gas extraction, and noisy, polluting, ecosystem-destroying ORVs!	Please see general comment responses #36 and #109
Glynn	Dennis	Transportation and Access	First I'd like to say "Thank You" to the BLM staff for including the four airstrips mentioned, in the subject title, above for continued use in the first draft of the new RMP. My strong wish is for you to also include them in the final version of the RMP, ensuring future casual use and visitation access to these airstrips. Additionally; I greatly	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
			enjoy the use of other strips such as - Mineral Canyon – Horseshoe Canyon - Gruvers Mesa and Sweetwater Reef just to name a few. I've been flying into Utah's back country for over 7 years and my family & I enjoy the ability to go to a place that is isolated and quiet for camping, hiking and exploring. These back country trips also help to make sure my sons realize and appreciate the beauty and greatness of these wonderful places. In your evaluation of the RMP consider that my family is no different from any other camper/hiker except that our access to these places by light aircraft is very low impact.	
JaDene	Denniston	Minerals and Energy Resources	I understand that we are in need of oil but to what destruction of land? Please help preserve our wilderness!! Do not sell it to companies who really only want the money for their own personal gain.	Please see general comment response #101
Brock	Dethier	Cultural Resources	And of course I think things like the petroglyphs in Nine-Mile Canyon are much more important than getting a little oil out of the area, so I hope no more exploration is allowed anywhere near such areas.	Please see general comment response #9
Brock	Dethier	OHV Route Identification	Since moving here, however, we have found that many of the most beautiful areas of Utah have been destroyed by off road vehicles and people interested only in profit. I would strongly encourage you to limit ORV use in your plan as much as possible and to do everything possible to keep them only on well-used roads.	Please see general comment response #19
Kasey	Dethlifs	Minerals and Energy Resources	I am writing concerning the Desolation Canyon in Utah. I just recently returned from a 12 day course with NOLS where we floated the GR on rafts and canoes and explored Desolation Canyon. I was amazed at the amount of wildlife that I saw on the trip and the overall solitude of the place. I greatly enjoyed my time on the river and feeling the peacefulness of being away from the noise of civilization. A few days ago I learned that the wilderness and quiet of the canyon may be jeopardized due to leasing of BLM land for oil drilling. I am not greatly educated on the politics of this process, but I am greatly concerned about how drilling would negatively affect the canyon areas. Not only would the drilling be noisy and unsightly, but it could very easily disrupt the delicate ecosystem of the desert. All of these things are what make the area such and amazing place to enjoy and visit, and my wish is that it will stay that way for many generations to come. I know my experience on the river really made me value nature and it's mightiness and the trip just wouldn't have been the same with the hum of oil rigs in the background.	The Desolation Canyon portion of the Green River is in a WSA where new oil and gas leasing is not allowed under any of the alternatives analyzed in detail.
Lee	Dexheimer	Minerals and Energy Resources	Please protect the Redrock Wilderness before its too late. Our government is far too reliant on petroleum and needs to pursue alternative energy sources that can and should be harnessed. Big business and oil companies lobby government too well and stop these vital changes and efforts needed to support future generations. A small amount of oil in Utah is not worth the price our environment would pay. Desert ecosystems are some of the most delicate offer some of the most dramatic and unique environments in the world.	Please see general comment response #101
Dawna	Dinkins	Minerals and Energy Resources	Your agency has not considered the most valuable natural gas plays in the Uinta Basin. You can't make such hard restrictions in the land planning document when you haven't completed the area survey. Our region stands to loose millions of dollars that could help the economy of Price, Green River, Castle Dale, and the whole area.	Please see general comment response #18
David	Dodson	Alternative Maps	I wish to express my dissatisfaction with additional trail closings and restriction. I would like ALL of the Chimney Rock/Summerville and Humbug trail systems left open. Links between these trails and the Arapeen Trail system would be beneficial to trail enjoyment.	Please see general comment response #31
David	Dodson	Recreation	The recently released Draft Environmental Impact Statement (DEIS), and Draft Resource Management Plan (DRMP) contains excessively restrictive camping regulations.	Please see general comment response #81

First Name	Last Name	Category	Comment	Response
Trish	Doherty	Minerals and Energy Resources	The BLM plan failed to consider whether any of the remote and untrammeled landscapes deserved permanent protection from oil and gas development. THIS IS ABSURD AND EXTREMELY UNWISE. It is time to see the long term consequences of all of our decisions.	Please see general comment response #18
Trish	Doherty	Process and Procedures	The Castle Country Heritage Plan is a reasonable, well-balanced plan, and it should be adopted by the BLM. This plan would protect the redrock wilderness' wild lands, wildlife and recreational opportunities.	Please see general comment response #35
Elizabeth	Donaldson	Wilderness	We all know that there are some priceless natural and historical areas of the wilderness which are being threatened by a plan being put forth by the Bureau of Land Management which would open up over 90 of the land to oil exploration, as well as building roads - Please do what you can to prevent this development, and do support the Redrock Wilderness Act now pending in Congress.	Please see general comment response #111
Tara	Downer	Minerals and Energy Resources	Once again, I am standing before my government begging that it act in a moral and logical manner. Millions of Americans are now realizing that our democracy has become meaningless in the face of oil and gas production. While scientists provide proof that this technology is harmful to our planet and citizens plead for better and cleaner forms of power, wars have been fought and public lands destroyed to protect the oil and gas industry.	Please see general comment response #18
DeeAnn	Downing	OHV Route Identification	please do not allow ORV trails within America's Redrock Wilderness Act nor any wilderness study areas. Please do not allow any open area usage.	Please see general comment response #12
Derek	Dowsett	Recreation	My biggest concern is the limits that you are placing on group size, and your permit requirements.	Please see general comment response #81
Derek	Dowsett	Recreation	The new RMP doesn't allocate any primitive camping for campers or RV's other than the one area with about 30 available spots.	Please see general comment response #81
Derek	Dowsett	Recreation	My biggest concern is the limits that you are placing on group size, and your permit requirements. This seems to hurt the groups and clubs that use the area more than it would affect the individual users. The other problem is the new RMP doesn’t allocate any primitive camping for campers or RV’s other than the one area with about 30 available spots. The swell is far too big and wonderful a place to place such a limit on how many people can camp there.	Please see general comment response #81
Derek	Dowsett	Recreation	I haven't camped in the area yet, but as I understand it there are very few places to camp in the Swell because the current RMP closed all primitive motorized camping. I am very worried if this is true because that limits where people can go and will place extra strain on the few areas that are left... Please reconsider the camping issue, because a lot of people visit this area. They should be allowed to camp on it. These lands are our lands. I appreciate your work managing them, but closure isn't management.	Please see general comment response #81
Denise	Dragoo	ACEC	UEI is particularly concerned by BLM's proposal of the new Range Creek ACEC (approximately 80,632 acres) which in effect extends the boundaries of the Turtle Canyon and the Desolation Canyon WSAs. Although BLM proposes to manage the ACEC to recognize valid existing rights, the area will be closed to further mineral development and surface disturbance will be severely restricted. Draft RMP/EIS at 4-507, 4-522, 4-525, Appendix 26. BLM does not fully explain how valid existing rights will be accommodated in these restrictive use areas...	Please see general comment response #128
Denise	Dragoo	ACEC	Furthermore, BLM's own policies provide that an ACEC designation cannot be used as a substitute for a wilderness suitability determination. BLM Manual 1613, Areas of Critical Environmental Concern. In addition, the proposed ACEC designation must include an analysis of the relationship of the ACEC to existing WSAs. BLM's conclusory statement that its proposed special use designations will have "no significant impact" on WSAs or ACECs is inadequate. Draft RMP/EIS at 4-389. This conclusory statement is not supported by the detailed analysis necessary to clarify that the ACEC is not simply a wilderness inventory area by another name. A careful explanation of the purpose and need for the Range Creek ACEC is essential, due to the history of the	Please see general comment response #156

First Name	Last Name	Category	Comment	Response
			controversial 1999 Utah Wilderness Reinventory, which began in 1996 under the Babbitt Administration and is still in litigation pending in the Tenth Circuit.	
Denise	Dragoo	Minerals and Energy Resources	UEI holds valid existing rights in the following federal coal leases: SL-066145 (issued 6/19/45), SL-066490 (issued 12/31/47), SL-069291 (issued 4/1/50), U-0126947 (issued 12/1/47), U-014217 (issued 2/1/55) and U-014218 (issued 2/1/55). UEI is pleased to see that BLM's planning criteria recognizes the existence of valid existing rights. Draft RMP/EIS, 1.5 at pages 1-6. However, UEI is concerned by special category areas proposed by BLM near the Project, including certain non-wilderness areas with wilderness characteristics and new proposed areas of critical environmental concern ("ACECs").	Please see general comment response #18
Denise	Dragoo	Wilderness	In conjunction with the Project, the BLM has granted UEI rights of way on public lands for surface facilities associated with an underground mine, a mine access road, a telephone line and a 46 KV power line. The Interior Board of Land Appeals ("IBLA") recently upheld BLM's grant of Project rights of way against a challenge by the Southern Utah Wilderness Alliance alleging that the Project would adversely impact lands with wilderness characteristics. Southern Utah Wilderness Alliance, 163 IBLA 142 (Sept. 22, 2004). The IBLA determined that BLM had taken a "hard look" at the environmental impacts of the Project on two wilderness inventory units ("WIUs") proposed in the 1999 Utah Wilderness Reinventory, Desolation Canyon Inventory Unit 8 and Turtle Canyon Inventory Unit 4, as well as impacts to the Turtle canyon Wilderness Study Area ("WSA"). 163 IBLA 142, 149. Notably, IBLA specifically quotes Stipulation No. 4 of Utah v. Norton, No. 96-C-870-B (D. Utah Apr. 14, 2003) which confirms that "[t]he 1999 Utah Wilderness Inventory shall not be used to create additional WSAs or manage public lands as if they are or may become WSAs." 163 IBLA 142, 148 (emphasis added). On the basis of this stipulation. IBLA concludes that the WIUs are not subjects to the restrictions on surface-disturbing activities afforded to WSAs under the non-impairment mandate of the Federal Land Policy and Management Act ("FLPMA"). 163 IBLA 142,148... In sum, to support the designation of ACECs or non-WSA areas with wilderness characteristics, BLM must significantly expand its analysis in a supplemental or new RMP/EIS. If BLM intends to rely on the 1999 Utah Wilderness Reinventory, this reinventory should be summarized and included in the revised RMP/EIS to enable full NEPA analysis and public comment.	Please see general comment response #108
Denise	Dragoo	Wilderness	UEI is concerned that the BLM Price Office is relying on the Utah Wilderness Reinventory to manage non-WSA areas as if they were WSAs. The Draft RMP/EIS acknowledges that BLM will not consider the designation of new WSAs in this planning process. However, contrary to the Utah v Norton stipulation, BLM relies on the 1999 Utah Wilderness Reinventory to determine whether non-WSA lands have wilderness characteristics and to designate special category lands... In addition, BLM's use of the 1999 Utah Wilderness Reinventory as the basis for these designations is inappropriate because this document was not subject to environmental analysis or public comment under the National Environmental Policy Act ("NEPA"). While the Tenth Circuit has upheld use of the 1999 Utah Wilderness Reinventory as an inventory tool under 201 of FLPMA, if this document is the basis for revision of the RMP and designation of ACECs, the reinventory must be subject to NEPA analysis... The RMP revision is a "major federal action significantly affecting the quality of the human environment" under NEPA 102(2)(C) and clearly requires an EIS... Therefore, BLM cannot use the 1999 Utah Wilderness Reinventory as the basis of its decisionmaking without incorporating the reinventory into the Draft RMP/EIS for NEPA analysis and public comment.	Please see general comment response #108
Mathew	Draper	Transportation and Access	I am taxpayer who likes to ride a 4 wheeler and take my 4 wheel drive vehicle on a dirt road and see where it goes, and enjoy nature that way.	Please see general comment response #10
Darcy	Dugan	Minerals and Energy	I am writing to express my concern for the proposed oil and gas initiatives in the Redrock Wildlands. These areas are very important to many people - not just those who benefit directly from the beauty and solitude of the	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
		Resources	wilderness but also for those who take solace in simply knowing that wild places exist. Places such as the Book Cliffs, Desolation, and Labyrinth canyons are truly national treasures. Oil and gas development would wipe the wildness from this area- and area that has been labeled for potential wilderness designation.	
Darcy	Dugan	OHV Route Identification	I am also concerned about ORV use in these wildland areas. I have a lot of experience trying to enjoy quiet recreation amidst ORV's and find them to be incompatible with wilderness experience. Furthermore, there have been hundreds of studies showing the detrimental impacts to vegetation and wildlife. I firmly support the BLM's proposal to prohibit cross-country ORV use.	Please see general comment response #19
John	Dugan	Transportation and Access	In addition to the recreational uses of the airports under your jurisdiction, I hope you will consider the importance of their contribution to safety for all general aviation flights over your lands as emergency landing sites. I have personally had the availability of just such an airport in Washington State when dealing with an in-flight engine problem.	Please see general comment response #21
Brenda	Dugmore	OHV Route Identification	Please allow these areas to stay open so we can continue to enjoy them.	Please see general comment response #19
Bill, Debbie and Kieran	Duke	OHV Route Identification	The draft Price RMP does not address any form of designation of specific trails for these users leaving the entirety of the Price BLM lands open to continued abuse, erosion and destruction, and infringing on the rights of hikers, and others to solitude and a wilderness experience without the sound of. It is important that there also be NO designated ORV routes in Wilderness Study Areas. Wilderness implies and means that man is a visitor who does not remain, and does not infringe on the natural situation by importing noise, erosion and other lasting effects on the land, habitat and wildlife. The BLM cannot allow any ORV routes in WSA's. Equally important is that in the future the BLM must also NOT allow ORV routes in all other lands included in the "Redrock Wilderness Act".	Please see general comment response #12
Bill, Debbie and Kieran	Duke	Process and Procedures	We endorse this citizens' alternative, and highly recommend that the Price BLM adopt it within the Price RMP because it is a much more balanced plan that will effectively protect the necessary lands, allow sensitive users such as hikers, rafters and kayakers the ability to continue enjoying the wilderness quality of the lands, while at the same allowing development in non-sensitive areas. It will also leave 2,862 miles of trails available and open for ORV use. This is sufficient. It is clear that rational thought would NOT allow 98% of these lands to be open to oil and gas leasing, and a vast access to ORV use.	Please see general comment responses #19 and #35
Dave	Duncan	Transportation and Access	Why all the road and trail closures in the San Rafael Swell area of Utah? I am opposed to closing public lands to popular public use without an overwhelmingly strong justification. This seems like a land grab by environmental elitists against average people who enjoy the outdoors. Lets support public access to our public lands, for all responsible users. If individuals abuse the land, lets hold those individuals accountable, rather than closing vast areas to virtually all current uses.	Please see general comment response #10
Lee	Duncan	Minerals and Energy Resources	I am writing with concerns about the revisions of your RMPs that could open public lands up to private oil and gas drilling. I understand the affects this will have on the delicate and beautiful ecosystems in S. Utah. These beautiful areas should not be squandered for Short-term, speculative gains. It is pure stupidity to keep trying to supply a dying industry at the cost of the environment.	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
Michael	Dunwood	Socioeconomics	WTMUA is comprised of over 43 businesses in Eastern Utah who share deep concerns over the social and economic viability and future of our regional communities. We collectively believe industry and energy development is needed to sustain our way of life and renounce the either-or debate that polarizes extractive industries and environmental protection when literally thousands of cases across the west show that mitigation and reliance on science works. We approach the notion of multiple-use not from the philosophy of a zero sum gain, but rather that recreation, energy extraction, and preservation can and should occur in concert with one another. Multiple use relates to a basic moral principle: these lands should provide the most good for the most people, and those who derive recreational benefits from the surface are the same people deriving life's comfort abilities in the form of reliable, secure, and affordable energy. Our alliance applauds BLM's fulfillment of NEPA requirements with respect to socioeconomic considerations. As you are aware, the poverty rate in both Emery and Carbon counties has increased when compared to statewide averages. More specifically, the population of Green River has decreased and economic vitality continues to decline. While we highly value the economic benefits of expanded tourism, we believe this component of our economy is volatile and should be supplemented by long-term environmentally responsible energy development. In 1999 the average wage of those employed by extractive industry was $65,000; A recent study by the Utah Energy Office shows that 75% of the expenditures allocated stay in the county where the well is sited. Sustainable high wages like these are desperately needed not only in Green River, but throughout the region of Eastern Utah. Moreover, we believe extractive industries provide the base economy from which restaurants, convenience stores, OHV interest, motels, and other interests thrive. A successful and thriving economy would also allow Green River to invest in municipal infrastructure which in turn allows us to promote tourism in our area and upgrade our declining downtown centre. Our alliance reiterates our desire to see an RMP providing the most benefit for the most people, again applauding not only moral reasoning, but in keeping with the BLM's multiple use charter now over 100 years old. WTMUA hopes you consider our economic situation in the context of social vitality in relation the rest of the state and nation... public input should be weighted by the interests of those who rely on the resources of public lands for basic human needs such as housing, food, and public schools. We appreciate and welcome those who vacation and recreate in Eastern Utah, but resent the assumption that public lands exist only for annual recreation. We encourage narrowly focused interest groups to recognize that people and families live, work, and rely on the resources of our public lands. Eastern Utah should be seen as more than a playground for the rest of the nation and should be recognized as a place where families and communities struggle to prosper and grow. We recognize that, as one of just seven states that are exporters of natural gas, we have a duty to provide something to the nation few other states can. To have badly needed natural gas stores in Utah kept away from American citizens due to poor public policy is reminiscent of a bad approach.	See general comment response #132 .
Pete and Chris	Eakle	OHV Route Identification	I do not see the trails we rode on in the maps associated with the preferred alternative. Why aren't they listed? I assume that is because the preferred alternative will close them... I would very much like to see that unrestricted, on-trail riding will still be allowed in those areas of the San Rafael Swell. This guide needs to clearly show which OHV trails in the San Rafael Swell and other affected areas will be affected by each alternative plan. And currently it doesn't. The current document is therefore flawed, since this critical information about affects on individual trails is missing. If left out by accident, then I request that you issues a supplement so the public will be clearly informed about this... Please don't close any currently legal trails in the Swell to OHV use. And please	Please see general comment responses #19 and #31

First Name	Last Name	Category	Comment	Response
			modify the DRMP/DEIS document so it clearly shows every OHV, bicycle and equestrian trail, and how they will be affected by each alternative.	
Vince	Eccles	Minerals and Energy Resources	Management of Utah lands, BLM and otherwise, to maximize dollars for a few corporations is an injustice to the people of Utah. Please consider less damaging options and slower extraction of our valuable minerals. I only see maximum greed in the proposed policies and not good stewardship. The current Draft Price RMP is written to aid maximum extraction of minerals. Why must we extract everything in this generation? We can leave something for the next 100 years. In particular, the opening of Desolation Canyon and the Book Cliffs to oil and gas drilling will permanently damage the natural beauty. Have you see the Uinta Basin from an airplane?? It is grotesque.	Please see general comment response #18
Vince	Eccles	OHV Route Identification	Also, I am a hiker, climber, skier, and horse rider. The current free-for-all with ATV's and dirt motorbikes is damaging the land. Please regulate these noisy monsters. They deserve to be on some dirt roads but they are presently destroying and scarring nearly all corners of Utah's beautiful landscape. These must be relegated to reasonable areas or roads. I do appreciate the designation of specific trails for ATV's. However, there are too many new areas opened to ATV's and dirt bikes in the plan. Please do not consider that free ATV's is the future of Utah. They cannot be; they are too damaging.	Please see general comment response #19
Carolyn	Edelmann	OHV Route Identification	The decision to designate specific trails for off-road vehicle (ORV) use is laudable. But the draft revision leaves open far too many and closes far too few. Motorized trails would remain on more than 2 million acres. Such intensive vehicular use interferes with primitive and quiet recreational activities (such as hiking and horseback riding). And motorized use damages riparian areas and other wildlife habitat.	Please see general comment response #19
Carolyn	Edelmann	Process and Procedures	I write to ask you to support the balanced alternative, the Castle Country Heritage Proposal, that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests without precluding any. Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands.	Please see general comment responses #35 and #36
Jim	Edelson	Minerals and Energy Resources	Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict... Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development.	Please see general comment response #18
Jim	Edelson	OHV Route Identification	I also urge you to protect these lands from further damage from off-road vehicle activity... The BLM should also move promptly to protect the areas where ORV damage is too great, including areas proposed for wilderness designation under the legislation now pending in Congress.	Please see general comment response #19
RICHARD	EDWARDS	OHV Route Identification	I BELIEVE THE RECREATIONALISTS OF UTAH SHOULD BE ABLE TO ACCESS OUR BLM AND FOREST SERVICE LANDS ON EXISTING ROADWAYS AND 4X4 TRAILS. I AM OF RETIREMENT AGE AND UNABLE TO HIKE INTO BACK COUNTRY AREAS, I THINK WE NEED TO HAVE ACCESS TO THE PLACES WE'VE ALWAYS BEEN ABLE TO SEE IN THE PAST. I DONT THINK SPECIAL INTREST GROUPS SHOULD TELL US HOW TO USE OUR HERITAGE.	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			MYSELF AND MY GROUP ALWAYS ADHEAR TO THE "TREAD LIGHTLY" RULES.	
Thomas	Egan	OHV Route Identification	Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands. And the only one that truly meets criteria set forth for the BLM at 43 CFR 8342 for vehicle route designation.	Please see general comment responses #12 and #35
Matthew	Ehrman	Minerals and Energy Resources	Not including Wilderness Study Areas there are 1 million acres of unprotected wilderness quality lands in the Price BLM district. The preferred alternative of the draft Price RMP would leave 98% of those lands open to Oil and Gas drilling and development. This is not a balanced approach to land management. Oil and Gas leasing, exploration, drilling and other development activities are not appropriate in proposed wilderness areas, scenic areas, ACEC's, important wildlife habitat, recreation areas, and areas where cultural resources are present or likely to occur. Many of these areas are some of the most beautiful lands in Utah and should be left undisturbed.	Please see general comment response #101
Matthew	Ehrman	OHV Route Identification	A better management approach would permit motorized vehicle use only on specifically designated roads and trails, and only after a thorough review of its environmental impacts. It would also be prudent to adopt a "closed unless signed open" policy to better manage off-road vehicles and prevent damage to proposed wilderness areas.	Please see general comment response #19
Scott	Eidson	OHV Route Identification	I am writing to express my utter dismay at the off road vehicle restrictions and confusing and misleading wording of this excessively verbose document. The restrictions outlined in the plan are unnecessarily restrictive and serve only to alienate people like myself who enjoy offroading with their families and club members. Please consider this a NO vote for the proposed plan!	Please see general comment response #19
Camilia	El-Bardisy	Wilderness	I am writing this letter to stress how important Utah's wilderness, deserts, and all of its natural beauties are to me. Please protect this beautiful and fragile landscape from oil drilling and off road vehicles. Many European tourists visit Utah and this may be a substantial economic benefit for Utah and America.	Please see general comment responses #109 and #132
Larry	Ellertson	OHV Route Identification	I have been led to believe that in conjunction with the public process of obtaining input that the information provided by USA-ALL members regarding the Chimney Rock/Summerville Trail systems was not included on the route designation maps in the DRMP. If this is the case it seems that it would be a problem that you would not want to deal with as you proceed further with this process.	Please see general comment responses #20 and #31
David	Elliott	Process and Procedures	I am writing to express strong concern about the Price Resource Management Plan draft alternatives. The loss of the Redrock Wilderness to energy exploration and development is too high a price for too small a return. Are four days of oil and four weeks of natural gas really worth the loss forever of the unspoiled wilderness area? In my view, no. The BLM should consider alternatives that would protect the redrock wilderness' wild lands, wildlife and recreational opportunities. As an American, "America the Beautiful" should be an accurate description of our land, not a nostalgic song. I urge the BLM to place the Redrock Wilderness and lands like it under permanent protection from oil and gas development. The Castle Country Heritage Plan is a reasonable, well-balanced plan, and it should be adopted by the BLM.	Please see general comment responses #35 and #36
Larry	Ellison	OHV Route	Your document is a little hard to follow when trying to read it on line, especially when you need to refer to some other page or section. The "OHV Route Designation Alternatives "maps don't show any open routes in the South	Please see general comment response #20

First Name	Last Name	Category	Comment	Response
		Identification	or Western portion of the area in question. I presume this is because they are shown on the San Rafael Swell Travel Plan Map? I tried to get what I thought might be that map, but the link was no good. The San Rafael Travel Plan Map should have been included in the map set for this project. Also there is no OHV Route map for the "No Action Alternative/As Things Are Now". How are we supposed to compare what we have now to what you propose to leave available for motorized users?	
Larry	Ellison	OHV Route Identification	The OHV Route maps for Alt C and D have a lot of cherry stem routes with the connector roads and trails closed. This is unacceptable. Being able to go to a destination one way and return by another route makes for a more interesting ride. It also spreads users out so their impact in any given spot is minimized. It's also a little safer to have an alternate route to return on. Storms, mechanical problems, lots of stock or other users, sickness, washouts, etc can make it desirable to have an alternate route. There seems to be some roads and trails that are stated to be open, but don't appear on the maps. Which part of the document prevails, the text or the maps?	BLM has attempted to make the text consistent with the OHV route designation maps (2-71 through 2-74) in the Proposed RMP/Final EIS. The BLM, with assistance of its cooperators (including Carbon and Emery Counties) has evaluated existing routes, considering resource impacts, safety considerations, landscape settings and recreational opportunities. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose would be closed to OHV use. See general comment response #31.
Larry	Ellison	OHV Route Identification	Any roads and trails that are presently open to motorized use should be left open. I would imagine that people that are more familiar with this area can suggest some that are now closed and should be reopened to motorized use. I find it difficult to believe every BLM and FS district in the US has always erred on the side of not closing enough by the time they have been thru this process several times over the last 30 years and NEVER closed anything they shouldn't have.	Please see general comment response #19
Tom	Emanuel	Recreation	I would like to comment on the proposed ban of motor use in Deso/Gray canyons. I don't think it is a good plan. The small amount of pollution put into a self cleaning environment like a major river minuscule. Why not target the real culprits, agriculture, transportation and the huge corporations that are exploiting the natural resources. Don't target the small business people that are already struggling to survive. A plan like this could be the last straw for many of them. Let the commercial river guides continue to be keepers of the river. They have been doing a great job of it since the days of Bus Hatch and the Kolb brothers and the present guides continue in the same fashion today. Don't turn Deso into a Disney Land like is happening in Dinosaur... Common sense dictates use of motors, especially in light of the increased demands on water in the Colorado drainage. High run-off will be absorbed by Flaming Gorge for a couple of years, leaving the Green experiencing low water for many more years to come. The BLM needs to implement plans that account for reduced flows on the river. The 5,000 cfs level is optimistic at best and greatly exceeds the flows of the past six years. Drought is endemic to the Colorado Plateau and perhaps, as studies show, likely for the near future. Plans should reflect the minimal flow released preponderantly from Flaming Gorge (i.e. -800 to 1200 cfs)... I strongly recommend that these proposed restrictions on motorized travel not be implemented. The restrictions are not necessary to preserve the canyon experience for experienced rafters, they increase the hazards for commercial passengers, and they lack data to demonstrate that the current use of two stroke motors has an environmental impact at all. This is a bad idea made worse by the fact that it has not been given appropriate time for public comment.	Please see general comment response #34
Tom	Emanuel	Soil, Water and Riparian	Finally, I cannot understand the difference between emissions from two and four stroke engines. With all of the gas and oil drilling and concomitant impacts, a minimal number of outboards will have negligible impacts on the riparian environment. Unless I see quantitative data to the contrary, I believe it flies in the face of equity to ban a	Please see general comment response #34

First Name	Last Name	Category	Comment	Response
			two stroke outboard and open Sand Wash and the region to gas drilling. One seasonal flash flood will flush more drilling mud and alkali into the river impacting the resource far more than a fleet of two stroke outboards. Commercial outfitters will likely pay to make the adjustment. This proposed restriction will simply price out the average private rafter with an old outboard purchased at a yard sale for a few bucks. They deserve the right to motor rafts through the extensive slow stretches of Deso-Grey.	
Lorna	Emdy	OHV Route Identification	We write to lend our voices in opposition to the proposal to designate almost every reclaimed mining route, two-track and wide cow path in the Northern half of the Price BLM field office area as open to motor vehicles. Wilderness areas should have no such motorized access. Conduct a thorough and proper study before implementing this ill-advised ORV policy and simply surrendering to the ORV lobby. Please rethink implementation of this short-sighted and disastrous policy. Maintain the integrity of these amazing landscapes. Act conscientiously and responsibly.	Please see general comment response #19
Brunie	Emmanuel	Process and Procedures	As an alternative, I endorse the Castle Country Heritage Plan. The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment response #35
Robert	Enriquez	OHV Route Identification	Trails are very valuable to each and every one of us and that is why we feel the urgency to comment about your DRMP. OHV, ATV, 4-Wheel Drive, and Single Track Motorcycle Use: OHV use has been a traditional use in the San Rafael Swell for many years. Many family outings have been planned around OHV use. It is important that we establish designated roads and trails, signage and maps so that OHV use may continue within the lands managed by PFO. We suggest that BLM and local governments work with the OHV communities to establish trail systems comprised of the most valuable roads and trails. This would be similar to the Arapeen Trail System found on the Manti LaSal National Forest. Following are some of SRMC¹s concerns and comments on OHV use in the DRMP.	Please see general comment response #19
Robert	Enriquez	OHV Route Identification	Sage Riders Motorcycle Club is concerned that although mentioned in the DRMP, no trails systems are shown on the Preferred Alternative. We feel that because the DRMP lacks a Route Designation Plan (Travel Plan), if we allow the BLM to make land use designations without a Travel Plan, we may lose hundreds of miles of motorized routes. We would like the BLM to open all existing roads and trails until all trail systems can be established. During this process, we suggest no Areas of Critical Concerns “ACEC” and Recreational Opportunity Spectrum-Non Motorized “ROS-NM” be considered until all trail systems are established. We want the BLM to recognize all inventoried roads and trails and we want them to designate the entire inventory as open. When the Travel Plan process begins, we suggest the BLM uses local OHV groups in designing and maintaining motorized trail systems. Trail systems are a very important management tool and have proven successful in other areas such as the Arapeen Trail System, Paiute Trail System and The Great Western Trail.	See general comment responses #15, #19 and #20
Robert	Enriquez	OHV Route	SRMC is very concerned that the PFO doesn¹t currently employ a Recreation Specialist with a personal interest	Please see general comment response #89

First Name	Last Name	Category	Comment	Response
		Identification	or involvement in motorized recreation. SRMC asks that BLM hire an OHV specialist and other staffers that have an interest in OHV management to properly manage this very popular sport. The BLM states that OHV management is a top priority for their Management Area, yet nobody on their staff is involved in motorized recreation.	
Robert	Enriquez	OHV Route Identification	F) SRMC would encourage the BLM to provide separate trails for OHV use and Mountain Bikers to prevent problems that may arise when both groups are sharing the trail. Many times Mountain Bikers are allowed into primitive areas where OHV use is not allowed. Therefore we maintain that Mountain Bikers should have their own trail systems. SRMC's Preferred Alternative on OHV use would be "No Action". On Page 4-483 under "NON-WILDERNESS LANDS WITH OR LIKELY TO HAVE WILDERNESS CHARACTERISTICS" it states "The presence and noise of OHV use of designated routes in all of the remaining non-WSA lands with wilderness characteristics would have a temporary adverse impact on opportunities for solitude and primitive recreation. Limiting motor vehicle use to designated routes, however, would minimize disturbances of adjacent lands protecting the natural character of these areas. No routes would be designated for OHV travel in Devils Canyon, Hondu Country, and Mussentuchit Badlands, and there would be no impact of OHV travel in these areas". SRMC is TOTALLY opposed to BLM¹s desire to close roads and trails in Devils Canyon, Hondu Country or the Mussentuchit Badlands area. These roads and trails have been used traditionally for years. There are already thousands of acres of land in WSA¹s that can provide for solitude and a primitive experience. If we allow the BLM to start closing designated roads and trails for this reason, it would give the BLM the opportunity to close even more roads and trails in the Swell.	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. As stated in Section 2.3, BLM will address use of non-motorized and motorized recreational trails in activity level plans. These plans will address use of trails for OHVs, hiking, equestrian use and bicycles. See the general comment responses #19, #20 and #82. Section 4.2.11 in the Proposed RMP/Final EIS is an expanded analysis of potential impacts on wilderness characteristics on non-WSA lands. Table 4-7 compares the acreage of the OHV management classes for each of the non-WSA lands with wilderness characteristics and the analysis states the number of non-WSA lands with wilderness characteristics areas that would be affected by OHV use.
Robert	Enriquez	Transportation and Access	It is very Important for the BLM to keep Connecting and Loop roads & trails open. Connecting roads and trails help lessen the impact on the surrounding area. For example, the Copper Globe road makes a loop, yet is closed off. It would make sense to make a loop and not have to turn around at the sight of the closure. E) SRMC asks that ALL roads closed by the San Rafael Route Designation Plan of February 2003, and which Emery County has filed RS-2477 claims upon, should be re-opened. This includes, but not limited to the following: Copper Globe, Devil¹s Canyon, June¹s Bottom, Link Flat, Picture Flat to Miller¹s Canyon, Red Hole Draw, Seger¹s Hole, Short Canyon and two roads closed in the 1991 Resource Management Plan, Mexican Mountain and Swasey¹s Leap.	Please see general comment responses #19 and #39
Robert	Enriquez	Wild and Scenic Rivers	SRMC believes that designation of any waterway or DRY WASHES as "Wild, Scenic or Recreational Rivers" would have a negative impact on recreation within the PFO area. SRMC asks that NO Wild or Scenic designations be made within the PFO. For example, designation of "Wild & Scenic" for Coal Wash both North and South is not appropriate. There is no value of water that runs through these dry washes nor any of the other dry washes which BLM has wasted time and money to evaluate for consideration as Wild & Scenic Rivers. To us, this is yet another example of dishonesty and corruption. To consider a DRY WASH as a potential Wild or Scenic RIVER implies that there is water involved.	Please see general comment response #88
Kevin	Erwin	Minerals and Energy Resources	The amount of fuel found in this wilderness area is so little that it hardly deserves even considering removing it. The value of the wilderness is far greater than the fuel beneath it.	Please see general comment response #101

First Name	Last Name	Category	Comment	Response
Jim	Essler	Minerals and Energy Resources	To preserve this land for our future, it must be protected from further "development" and exploitation. In particular, oil and gas development	Please see general comment response #18
Jim	Essler	OHV Route Identification	To preserve this land for our future, it must be protected from further "development" and exploitation. In particular, off-road vehicle use must be severely restricted and limited to those areas which do not have wilderness qualities.	Please see general comment responses #12 and #36
Barbara	Eubanks	OHV Route Identification	The wilderness in Utah needs to be protected from off-road vehicles that destroy the natural habitat. Keep in mind that 50 - 100 years ago there were almost no off-road vehicles, now there are thousands and where they were at one time used mostly on week-ends it is now a constant stream every day. There needs to be adequate opportunity for both motorized and non-motorized recreation in Utah, while avoiding conflicts between the two groups.	Please see general comment response #19
Deborah	Evans	OHV Route Identification	I am also deeply concerned about the careless use of more and more off-road vehicles. Please do not allow hiking trails to be designated as highways as a way to accommodate these vehicles.	Please see general comment response #19
Deborah	Evans	OHV Route Identification	It is imperative that ORV trails be clearly mapped and signed, and that the BLM actively enforce limits on ORV use in restricted areas.	Please see general comment responses #15 and #19
Deborah	Evans	Wilderness	I am alarmed about some serious threats to wilderness lands in Utah. I know that there is extreme pressure to open our pristine back country to motorized routes, oil drilling, and off-road vehicle trails. It would be a serious mistake to cave into this pressure. Please do not allow oil companies to drill for oil and gas on these lands.	Please see general comment responses #109 and #111
Deborah	Evans	Wilderness	Proposed areas for protection are the San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek. Please protect these wilderness areas for us and those who will follow us.	Please see general comment response #109 and #111
Michael	Evans	Minerals and Energy Resources	I know the need for oil and gas production, short sighted as it, is there. There are some places that have greater long term value. The citizen proposed wilderness and WSA's deserve protection. They amount to a fraction of the land available for petroleum production and ORV misuse. I personally value wilderness quality lands greater than damaging impacts of development.	Please see general comment response #101
Michael	Evans	OHV Route Identification	I have lived and worked within the bounds of the Price resource office for the past two years. Most alarming is the growing misuse of ATV's, ORV's or what not. Their presence is inescapable. They have trespassed on in the Upper Horseshoe Canyon area, Keg Knoll, and Price River corridor. There needs to be a effort to enforce and exclude these vehicles and provide a place for their use that is already impacted; which amounts to about 95% of the land in your management area.	Please see general comment response #19
Sarah	Evershed	Minerals and Energy Resources	It would be amazing to ban oil and gas drilling in the beautiful, important and amazing southern Utah land.	Please see general comment response #18 and #111
Sarah	Evershed	OHV Route Identification	I would love and demand to see vehicles restricted to designated roads and trails, a "closed until posted open" policy, adequate opportunity for both motorized and non-motorized recreation	Please see general comment response #19
Eric	Ewert	Minerals and Energy Resources	Please protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. The very short-term financial gain from these activities leaves everlasting scars in a fragile arid environment that impairs just about every other use of these lands.	Please see general comment responses #12, #36 and #101
Eric	Ewert	OHV Route Identification	Please employ every means possible to limit the horrible destruction wrought by unregulated ORV use. Whether it is analyzing new routes, designating "open areas," or allowing access to WSAs, error on the side of protection and preservation.	Please see general comment response #12

First Name	Last Name	Category	Comment	Response
Steve	Ewing	OHV Route Identification	As a taxpayers we should be allowed access to the San Rafael. Impose some restrictions on the smaller vehicles like the 4 wheelers that are tearing things up, but don't lock everyone out. There are alot of responsible people that like to go in there . Don't punish everyone because of a few.	Please see general comment response #19
Julio	Facelli	Minerals and Energy Resources	I urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear cougar and other wildlife they offer.	Please see general comment response #18, #36
Kirk	Fackrell	Recreation	I am writing to comment on this plan. I think the plan in poorly written and confusing. I am against limiting motorized access in this area. I think we need more access to these recreation areas, not less. I also disagree with the group size limitations. I think access should be available to all – especially people with disabilities who can't walk to all of these areas.	Please see general comment responses #80 and #81
Jason	Faith	Process and Procedures	The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #12, #35 and #36
Gaynol	Fales	Minerals and Energy Resources	Please abandon your plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office that includes the lands covered by the Redrock Wilderness Act. Please protect them from oil and gas drilling.	Please see general comment response #18
Matt	Farmer	ACEC	I read the draft RMP, then, with a great deal of disappointment. Certainly, there are many intelligent features, like the Range Creek, Nine Mile Canyon, and Rock Art Areas of Critical Environmental Concern. But, no ACEC should allow for oil and gas development, as this intensive industrial use cannot be reconciled with the very purpose of creating ACECs in the first place. I am especially disappointed that so many areas, under the draft plan, will not receive even the limited protection afforded by ACEC status. Specifically, I am troubled about the absence of any enhanced protection as ACECs for the following areas, many of which the Utah BLM has found to have wilderness characteristics in the 1999 Wilderness Inventory, or which the Utah BLM has since found likely to have wilderness characteristics: Lower Green River; Beckwith Plateau - Middle Mountain; Green River - Desolation Canyon; Price River; Temple-Cottonwood-Dugout Wash; and especially Gordon Creek.	Please see general comment response #30
Matt	Farmer	Wilderness	I am also concerned that the draft plan does not adequately protect the wilderness characteristics of areas, other than pre-1991 WSAs, and covering over 950,000 acres, that the Utah BLM has subsequently determined to have, or likely to have, wilderness characteristics. I understand that many of these areas have nominal consideration as parts of SRMAs or ACECs, but these land management categories will clearly not avoid impairment of these areas as potential wilderness in the event Congress acts consistently with BLM's findings and protects these areas as statutory wilderness as additions to the National Wilderness Preservation System.	Please see general comment responses #36 and #109
Paul	Farnsworth	OHV Route Identification	Understanding the frailty of the area, we have always been very careful where we camp and drive our vehicles. We understand that we have the obligation to preserve this area for generations to come. We do NOT feel it is the governments place to restrict our full access to this public access area, when we are not abusing the environment. I am by no means an expert in this field, but I do know that our access to some areas (Swayse's	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			Leap for instance) has been restricted except to foot access. Since that restriction, we have never been back. Not everyone has the ability to hike in. Others simply prefer to enjoy the area by riding through in OHV. As long as these vehicles remain on designated trails and roads, what harm do they cause? We masses should not be punished for what a few knuckleheads do.	
Paul	Farnsworth	OHV Route Identification	It has recently come to my attention that the BLM is considering placing further restrictions on public access of OHV to many areas of Central Utah. I am very concerned about this. For more than 50 years, my family has been spending Easter Weekend in various locations in the deserts of Central Utah. Over the years, our family has grown and we now have well over 100 people in our group each year.	Please see general comment responses #19 and #81
Priscilla	Farrall	Minerals and Energy Resources	I am opposed to the BLM opening up Utah's wild places to oil and gas development.	Please see general comment response #18
Priscilla	Farrall	Wilderness	I urge you to replace your current draft plans with a balanced plan that includes wilderness protection.	Please see general comment response #109
Christine	Farrell	Minerals and Energy Resources	I urge you not to allow drilling in Nine Mile Canyon. It is a place of natural wonder and beauty and sacred to may tribes of Native People. The R.M.P. should protect the canyon bottom and sides from any drilling or industrial development.	Please see general comment response #18
Bob	Felter	Minerals and Energy Resources	Gas and oil should be left alone on the Utah Wildlands, and efforts put instead into alternative energy production. Exploration there is ultimately to line the pockets of a few, at the expense of many.	Please see general comment response #18
Jeremiah	Ferguson	OHV Route Identification	The San Rafael Route Designation Plan calls for more road closures and trail closures as an off-road person, either in my truck or on my bike, I ask that you keep these roads open so if and when I go to Utah I will be able to use them and enjoy the country.	Please see general comment response #20
Tom	Ferguson	OHV Route Identification	There are already too many places open to off road vehicles. There are so many that nearly 80% of the lands managed by the Price office are within 1mile of a motorized route. I favor more regulation of the use of ATV's and other off road vehicles including the closing of roads to exclude motorized traffic. Increasing the amount of ORV use by opening additional routes or failing to regulate their current use will make it increasingly difficult for those outdoor recreationists and sportsmen who desire to escape (however briefly) the noise and sight of the internal combustion engine.	Please see general comment response #19
Tom	Ferguson	OHV Route Identification	Current routes and proposed routes should be analyzed to minimize the impacts on the environment and other non-motorized uses. ORV routes should not be on lands within any existing wilderness study areas.	Please see general comment response #12
Tom	Ferguson	OHV Route Identification	There simply should not be any "open" areas where ORV's are unregulated. This I feel would begin to legitimize a type of irresponsible behavior that could be repeated in regulated areas.	Please see general comment response #19
Tom	Ferguson	Process and Procedures	Please support the provisions of the citizens Castle Country Heritage Plan. It offers solid solutions to the competing interests of the lands users: those who want to develop it and those who want to preserve it.	Please see general comment response #35
Tom	Ferguson	Wilderness	I think that the highest priority should be given to efforts to preserve special areas from the destructive effects of oil and gas prospecting and development. Wilderness and wilderness quality lands should not be compromised by the unregulated use of vehicles and oil and gas leasing activities. Areas such as: Upper Desolation Canyon, Nine Mile Canyon and the Price River Canyon should be spared from this type of industrialization.	Please see general comment responses #36 and #109
Tom	Ferguson	Wilderness	There are wilderness quality lands Such as: Sid's Mountain in the San Rafael Swell and Muddy Creek that simply should not have to bear the destructive impact of off road vehicle use. I support the Castle Country Heritage Plan	Please see general comment responses #19, #35 and #109

First Name	Last Name	Category	Comment	Response
			as the only alternative that offers adequate wilderness protection. I feel that none of the Price R.M.P. proposed alternatives do a sufficient job of protecting wilderness. Wilderness and wilderness quality lands are irreplaceable. The short-sighted, for profit motives of energy prospecting and extraction will ruin many of the places worth protecting.	
Tomj	Ferguson	OHV Route Identification	There are already too many places open to off road vehicles. There are so many that nearly 80% of the lands managed by the Price office are within 1 mile of a motorized route. I favor more regulation of the use of ATV's and other off road vehicles including the closing of roads to exclude motorized traffic. Increasing the amount of ORV use by opening additional routes or failing to regulate their current use will make it increasingly difficult for those outdoor recreationists and sportsmen who desire to escape (however briefly) the noise and sight of the internal combustion engine. Current routes and proposed routes should be analyzed to minimize the impacts on the environment and other non-motorized uses. ORV routes should not be on lands within any existing wilderness study areas. There simply should not be any "open" areas where ORV's are unregulated. This I feel would begin to legitimize a type of irresponsible behavior that could be repeated in regulated areas.	See general comment responses #12 and #19
Delynn	Fielding	Socioeconomics	Carbon County Airport has a growing impact on our local economy. Over the last few years several million dollars of improvements have been made. In the next two years $2,000,000 of improvements are planned and funds earmarked. Because of the size and growing amenities of the Carbon County Airport aviation related business is growing in economic impact and importance in our area. Part of the growing impact is flight training and more recently back country or mountain flying training. Any of the proposed plans would have a negative impact on Carbon County if all the back country airstrips are not allowed in the Price Field Office Draft Resource Management Plan (RMP). All eleven should be designated and allowed for continued usage.	The Price BLM is not currently planning on any airstrip closures through this RMP revision process. Any future closure of existing backcountry airstrips would be done only on a case-by-case basis and would adhere to the following provisions. Section 345 of Public Law 106-914 states that the Department of Interior can not permanently close aircraft landing strips, officially recognized by State or Federal aviation officials, without public notice, consultation with cognizant State and Federal aviation officials and the consent of the Federal Aviation Administration. Landing strips damaging soil and water resources or impeding agency compliance with existing laws and/or regulations may be closed following appropriate public notice, consultation and consent. Short-term closures are not affected by this provision.
Delynn	Fielding	Socioeconomics	Carbon County Airport has a growing impact on our local economy. Over the last few years several million dollars of improvements have been made. In the next two years $2,000,000 of improvements are planned and funds earmarked. Because of the size and growing amenities of the Carbon County Airport aviation related business is growing in economic impact and importance in our area. Part of the growing impact is flight training and more recently back country or mountain flying training. Any of the proposed plans would have a negative impact on Carbon County if all the back country airstrips are not allowed in the Price Field Office Draft Resource Management Plan (RMP). All eleven should be designated and allowed for continued usage.	The Price BLM is not currently planning on any airstrip closures through this RMP revision process. Any future closure of existing backcountry airstrips would be done only on a case-by-case basis and would adhere to the following provisions. Section 345 of Public Law 106-914 states that the Department of Interior can not permanently close aircraft landing strips, officially recognized by State or Federal aviation officials, without public notice, consultation with cognizant State and Federal aviation officials and the consent of the Federal

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				Aviation Administration. Landing strips damaging soil and water resources or impeding agency compliance with existing laws and/or regulations may be closed following appropriate public notice, consultation and consent. Short-term closures are not affected by this provision.
Delynn	Fielding	Transportation and Access	The RMP briefly mentioned four back country airstrips. In point of fact there are 11 known back country airstrips in the two county area and several more just outside the county lines that may also be impacted by the RMP. These back country strips are existing features with no cost to the BLM. Maintenance primarily done by the users and they would have no budgetary impact on the BLM. Some of the strips are old enough to be classified as historical. The total directly impacted area of the eleven strips is less than about 30 acres spread over thousands of acres. ALL these existing strips should be allowed under BLM casual use guidelines. Back Country Airstrips in Wilderness or Other Protected Areas: There are several examples that back country airstrips are proven not to be detrimental to wilderness or protected areas. The following examples demonstrate this in a wide variety of locations and country settings. There are 18 back country airstrips in Idaho in the Frank Church River of No Return Wilderness Area and 2 in the Bitterroot Wilderness area, one in the Death Valley National Park in California, and one in Montana's Black Butte Missouri Breaks National Monument. There are no compelling reasons or efforts to close the usage of these strips. In all of these cases, there is no evidence that wildlife has been adversely affected. Nor is there any evidence that the eleven strips in this area should be closed or restricted in anyway. In fact they are no expense existing asset to land management and usage. The airstrips can be used for fire protection, medical evacuation; in addition to serving as 'trail heads' for recreation purposes. Liability: Allowing the eleven strips gives no liability to the BLM for allowing these back county air strips. Usage is covered under Utah's recreation use statute. The Tenth Circuit Court has consistently held the US Government and agencies is also covered under FAR 91.3c. This has been confirmed by at least six other circuit courts. The pilots using these back country airstrips are licensed by the Federal Government for skill and safety. The plane must also be regularly maintained. After many years of the US Forrest Service in Idaho having several back country airstrips in designated wilderness areas, they have never been sued for their existence or use.	Please see general comment response #21
Delynn	Fielding	Transportation and Access	Motorized Vehicle Designation: Airplanes should be excluded if an area is closed due to any motorized land use. The airplane motor does not drive the wheels and consequently have little impact on the actual land. While planes do have motors they do not exhibit the same impact as other motorized units and therefore should be specifically excluded from appropriate regulations.	Motorized vehicle designations in BLM Travel Plans or other documents are for surface vehicles only and do not include aircraft. We agree that small aircraft, responsibly handled, have minimal if any impact on the resources.
Delynn	Fielding	Transportation and Access	The RMP briefly mentioned four back country airstrips. In point of fact there are 11 known back country airstrips in the two county area and several more just outside the county lines that may also be impacted by the RMP... ALL these existing strips should be allowed under BLM casual use guidelines... Motorized Vehicle Designation Airplanes should be excluded if an area is closed dues to any motorized land use. The airplane motor does not drive the wheels and consequently have little impact on the actual land. While planes do have motors they do not	Please see general comment response #21

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			exhibit the same impact as other motorized units and therefore should be specifically excluded from appropriate regulations.	
Larry	Filener	Transportation and Access	I have reviewed your "Resource Management Plan" concerning back country airstrips (page 20), and I would like to register my support for alternative D. The Mexican Mountain spot is one of our favorites due to the proximity of interesting hiking and petroglyphs (besides being a really beautiful camping spot). I would also like to mention that there are several strips I am familiar with that are not included on your list. What does that mean for their status? I know of at least Horseshoe Canyon and Sagebrush Bench (there may be others). Hopefully one of the outcomes of your process would be to inventory all existing strips and include them in your oversight process (I know the UBCP would very happy to assist you in maintenance and upkeep of these strips).	Please see general comment response #21
Doreen	Finley	Wilderness	I am writing this letter to express my concern over protecting the wilderness areas of Utah from development, exploitation or uncontrolled use... It is hard for me to imagine visiting one of our beautiful sites in Utah and having to go through a drilling field or other development on my way there. Wilderness areas are best left as they are for wildlife and nature to continue as they were intended and created for. It would be my hope that those in positions of influence in Utah would consider some of these points when approving any work to be done inside the wilderness areas of our great state.	Please see general comment response #109
Nancy	First	Wilderness	I want to support you in urging the BLM not to sacrifice the 1.5 million acres of wilderness-quality lands that are covered by America' Redrock Wilderness Act. There should be no oil and gas development or off-road activity. These precious places must be left to our children and their families and all who come after. Moving too fast can destroy our future.	Please see general comment response #111
Janine	Fitzgerald	Minerals and Energy Resources	I am appalled that the BLM is considering opening up much of the Price Resource Area to oil and gas drilling. There are exciting new technologies beginning to be available that would allow oil and gas companies to extract minerals without completely destroying the surface. These technologies are only beginning to be used. But the BLM and Forest Service under industry pressure are giving away our public lands without forcing Oil and Gas companies to use best available technologies as recommended by President Bush. The BLM should hold off of allowing Public Lands to be open to oil and gas drilling until the technology is available. This allows the BLM follow it's own mission statement of sustainable multiple use.	Please see general comment response #18
Jerry	Flesher	Transportation and Access	I hope that you will include mention or some sort of official language in the RMP to safeguard the future visitation of these airstrips.	Please see general comment response #21
Charles	Fligel	Transportation and Access	This airstrip access to wilderness and remote places is one of the truly great treasures that some of the Western states have. Utah needs to embrace these gems and to work for continued access to these airstrips.	Please see general comment response #21
Charles	Fligel	Transportation and Access	For pilots like myself, going to a backcountry airstrip is one of the priceless aviation experiences. There is also a safety factor provided by every airstrip that is available. Because of the location of these backcountry airstrips, they are more valued than any others since if an emergency occurs there are few other places nearby to make an emergency landing. I urge you to continue providing access to your state's valuable assets, backcountry airstrips.	Please see general comment response #21
Bobbie Dee	Flowers	Process and Procedures	The public lands of the Price Resource Area are a special part of this country's national heritage and should be protected for the use and enjoyment of all Americans. Unfortunately, the recent draft revision to the Price Resource Management Plan (RMP) fails to ensure such protection. Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country	Please see general comment response #35

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			Heritage Proposal your full support. It's the right choice for our public lands.	
Julie	Ford	Minerals and Energy Resources	We urge you to see that the Price Resource Management Plan protects all wilderness quality land from development, resource extraction.	Please see general comment response #101
Julie	Ford	OHV Route Identification	We urge you to see that the Price Resource Management Plan protects all wilderness quality land from the devastation of off-road vehicles.	Please see general comment response #12
	Form Letter	Alternative Maps	The maps are flawed. The DEIS does not contain adequately detailed maps, therefore preventing our members and the public from understanding, and therefore commenting upon, the specific trail designations at issue. BLM has failed to adequately research and document right-of-way ownership within the PFO, resulting in assertion of BLM jurisdiction over state, county and/or private property. BLM's OHV Route Designation Map for the Preferred Alternative includes nearly 100 miles of paved roads! In fact, the vast majority of the 'green lines' BLM has represented to the public as "open for OHV use" (Map 2-56) are currently closed to unlicensed, OHV use. The vast majority of the routes represented on Map 2-56 are not under BLM's jurisdiction. Their use by vehicles is governed by County ordinance pursuant to State Law. While BRC/USA-ALL acknowledges the importance of cooperation between adjacent jurisdiction when formulating OHV Route Designation Plans, we think representing the 'green lines' on Map 2-56 as open for OHV use is misleading. Similarly, the DRMP/DEIS refers to the Chimney Rock/Summerville Trail System and the Arapeen Trail but fail to accurately depict these routes on any map or describe their location at all. Similar flaws exist on all OHV Route Designation Maps in the Appendix. This presents a situation where it is simply impossible for the public to compare and contrast the Alternatives. Different maps were displayed for public review at different meetings. Maps displayed for public review at several public meetings bore no resemblance to maps contained in DRMP/DEIS. Additionally different OHV Route Designation Maps were displayed at different meetings.	See general comment responses #20, #31 and #32. Map content in the RMP has been completed from BLM standard datasets and presented with the most clarity possible. The 8 1/2" by 11" format for the maps in the RMP creates a problem when detail rather than precision is needed for review. Designated routes would only be assigned on BLM administered lands. Connecting routes over state, county and/or private property are shown for continuity purposes only. The BLM used the same set of OHV maps at each of the public meetings.
	Form Letter	Process and Procedures	B: SPECIFIC COMMENTS REGARDING FLAWS IN THE DRMP/DEIS: The DRMP/DEIS insufficiently and inaccurately describes the purpose and need to amend RMP. Obviously, the BLM must go beyond the statutory requirement to amend the plan when describing the purpose and need. BLM is required to define specific areas where management needs to be changed. Chapter 1 should clearly describe why different type of management is needed. Example: In section 1.2.2, under "Need", BLM states: Changes in recreation users and types of recreational opportunities have resulted in conflicts and resource concerns that the old plans were not designed to address. A reader may reasonably ask; what are the changes in recreation users and types of recreational opportunities and how have these changes resulted in conflicts? What is it about the old plans that limited their ability to address these changes? The next sentence does not suffice as an answer: These uses need to be addressed in terms of how they affect local communities, regional and state interests, and ecosystem health. Changes in user types and recreational opportunities do not translate to "uses" without adequate explanation. This sentence only raises additional questions; how do these uses (or changes) affect local communities, regional and state interests? What are the impacts to ecosystem health that require change in management?	There are many purposes and goals for the Price Plan. A purpose and need statement is provided in Chapter 1 of the Proposed RMP/Final EIS. Goals and objectives are described in Chapter 2 and the current conditions and trends in resources and uses that would be changed or affected by the proposed actions are described in Chapter 3 of the Proposed RMP/Final EIS. The comparison of the impacts of the various action alternatives with the No Action Alternative provided in Table 2-24 of the Proposed RMP/Final EIS shows how various resources and uses would change to meet the needs for the plan revision. Also see general comment responses #11, #20,#31 #37, #39, #132, and #139.

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			Another example: In the same section, BLM states: In addition, the emergence of new exploration and extraction technologies has changed the type and level of impacts to various resources. The PFO RMP/EIS will allow for these impacts to be addressed. What are the new technologies and what are the changes in type and level of impacts to various resources? The agency needs to be more specific. The changes in technology we are aware of have reduced impacts of oil and gas development (horizontal drilling, for example). So why do the changes between the old land use plan and all of the action alternatives in the DRMP/DEIS include substantial restrictions on oil and gas development? Frankly, we're confused. What is it that necessitates the need for the change? This problem is especially pronounced when addressing recreational uses. At a time when recreation on public lands is increasing and becoming increasingly important to the American public, BLM has proposed significant reductions in use levels in virtually every action alternative. But the document fails to tell us why. The document contains no nexus between the current condition and the management in each action Alternative. Chapter 1 is the proper place to inform the general public about changes taken place and why the old land use plans are inadequate. Chapter 1 fails to adequately or accurately support the need for change as well as support the range of alternatives. Chapter 1 must be supplemented with information that accurately describes the need for change in such a way that the general public and decision makers can reasonably discern how each Alternative addresses each need and how each Alternative responds to the issues. The DRMP/DEIS fails to provide a description of alternatives that is clear and concise. The critical flaw in the DRMP/DEIS is that it is written so that the public and decision makers simply cannot determine what LUA's BLM has identified. This is a basic and critical mandate placed upon the agency and cannot be ignored. BLM has failed to clearly and concisely describe management Objectives and desired future condition. The document fails to describe how allocation "tools" meet the management objectives. The public is presented with a hodge-podge of overlapping and confusing management layers each with its own impacts to recreation. The reader cannot determine what management proscriptions apply to their choice of recreational activity at any given place, let alone the rationale BLM is using for the various management restrictions. Example: Chapter 2 describes management restrictions pursuant to the goals and objectives in the San Rafael Swell SRMA and then indicates an activity plan will be completed. Overlapping the SRMA is a "High Use Area" with yet another activity level plan associated with it. Within the SRMA and adjacent to the High Use Area is an ACEC, complete with its own management restrictions. Overlapping all of this are group size and vehicle restrictions contained in ROS classes. The DRMP/DEIS contains a fatal inconsistency that must be corrected. Although the DRMP/DEIS purports to recognize valid existing rights, it goes out of its way to ignore critical rights of access. The BLM simply cannot	

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			have it both ways. On one hand, BLM says one of their key planning criteria is to recognize all valid existing rights, on the other hand BLM says RS 2477 rights-of-ways will not be considered. On one hand, BLM says RS 2477 rights-of-way assertions will be “settled as determined by the Administration.”, on the other hand BLM purports to close asserted RS 2477 rights-of-way and threaten fines and imprisonment to any American who chooses to use a vehicle on these roads. The BLM cannot assume that it has authority or discretion to close or to assume jurisdiction over public roads, which by law are controlled by local government. Such an assumption on the Bureau’s part is without observance of procedure required by law; and would have to be considered by even the most casual observer as arbitrary, capricious, and an unwarranted attempt to usurp local governments’ authority and rights. Utah’s RS 2477 rights-of-ways are public assets held in trust by the county and the state. The development of alternatives or any planning activity that would result in the signing of RS 2477 assertions as closed would result in significant harm to many public land visitors especially our members and supporters. Public roads, ways, trails, etc. can only be closed in accordance with State law, which requires a public process, generally carried out by local government. BLM cannot take away, and is specifically required and mandated by law to protect valid existing rights in its planning and management of the public lands. There is well-established law that a county or other governmental entity does not need to assert “claims” nor does the BLM need to recognize, a right-of-way, in order for the county to exercise its rights. The BLM must recognize that much of the public access and transportation infrastructure which provides access to public lands in the West is an integral part of the history, the culture, and the socio-economic fabric of the area. These roads are, in fact, a resource and part of the physical infrastructure of counties and local governments and should be recognized as such. Regardless of pending litigation or negotiations over RS 2477 assertions, must find a way of dealing with this issue that is consistent, or at least not inconsistent, with applicable law and which does not force the counties or other public land users into adversarial positions and expensive litigation. BRC/USA-ALL recommends BLM use the RMP process to address asserted rights-of-ways. Where BLM and the state and counties disagree, specific rights-of-ways should be adjudicated. Management Objectives are not correctly defined in the DRMP/DEIS. Land use plans guide management actions on the public lands covered by the plan. Land use plan decisions establish goals and objectives for resource management (i.e., desired future conditions), the measures needed to achieve these goals and objectives, and parameters for using BLM lands. They identify lands that are open or available for certain uses, including any applicable restrictions, and lands that are closed to certain uses. Land use plan decisions ordinarily are made on a broad scale and customarily guide subsequent site-specific implementation decisions. Land use plan decisions for public lands fall into two categories: desired outcomes (goals, standards, and objectives), and allowable uses and actions to achieve desired outcomes. Goals are generally broad statements of desired outcomes (e.g., maintain ecosystem health and productivity, promote community stability, ensure sustainable development). They are usually not quantifiable. Objectives identify specific desired conditions for resources. Objectives have established time frames, as appropriate, for	

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			achievement and are usually quantifiable and measurable (e.g., manage vegetative communities on the upland portion of the Clear Creek watershed to achieve by 2020, an average 30 to 40 percent canopy cover of sagebrush to sustain sagebrush-obligate species). The Goals and Objectives in the DRMP/DEIS for the various categories of resources, resource uses, special designations, and support are described in Sections 2.2 through 2.5, respectively (2.1.2 Goals and Objectives DRMP/DEIS pp 2-2 through 2-6). None of these "Goals and Objectives" can be remotely described as specific. None contain time frames for achievement or do they included quantifiable measurements. This is no small matter. It cannot be lawfully remedied by changed section 2.1.2 from "Goals and Objectives" to read simply "Goals". Yet, it seems the DRMP/DEIS treats "management objectives" as Goals. Inconsistencies abound within the DRMP/DEIS pertaining to OHV use making the document unintelligible. Another indication of the document's critical flaw is the inconsistency when describing management actions. One example: In section 1.6.10.1 Off-Highway Vehicle Use BLM states: OHV use has become a significant issue within the PFO. OHV use and management will be addressed in conformance with the BLM National OHV Strategy in an effort to resolve resource conflicts that pertain to other natural resources and provide for responsible OHV use. Existing OHV use categories and route designations will be reviewed and modified where needed to meet changing resource objectives. Within the limited category, BLM will designate specific roads and trails for OHV use. The 2003 San Rafael Motorized Route Designation Plan is incorporated by reference into this RMP. The document states that OHV route designations will be reviewed and modified where needed to meet changing resource objectives but also states that the San Rafael Motorized Route Designation Plan (the first time we've heard it called that) is incorporated by reference into the RMP. I can't tell you how many OHV enthusiasts who called BRC/USA-ALL offices to ask which is it: are route designations going to be reviewed and modified or is the San Rafael Route Designation Plan going to be incorporated into the RMP? It's a darned good question. The DRMP and DEIS contains conflicting information regarding the OHV area designations, in some places stating that "all OHV recreational activity will be subject to designated trails" (all alternatives DRMP/DEIS 2-86), but in other areas stating that "Small open areas for OHV use would be considered near local communities and managed by BLM" (Alternative A DRMP/DEIS 2-86). Another example is how ROS is treated totally inconsistently in various SRMA's. In all SRMA's except the San Rafael, SPNM classes are closed to vehicle use. In the San Rafael SRMA, the document is silent on any vehicle restrictions related to ROS. What is the public to think? Another inconsistency is a reference in Chapter 2 to the popular Chimney Rock/Summerville trail systems and Arapeen Trail connector routes and implies they will be designated as open to vehicle use (see DRMP/DEIS 2-82, 2-83). Can the public reasonably assume these popular OHV routes will remain open? Who can say? The document is conflicting by not including any of these routes on any of the OHV route designation maps.	
	Form Letter	Recreation	A. COMMENTS AND RECOMMENDATIONS REGARDING RECREATIONAL USE ALLOCATION; DECISIONS PROPERLY MADE IN A RESOURCE MANAGEMENT PLAN	See general comment responses #50, #81 and #143. This Proposed RMP does not reduce

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			Important note: This section is based on the assumption that the BLM will issue a Final Resource Management Plan and Final Environmental Impact Statement without supplemental disclosure, analysis and public participation. BRC/USA-ALL strongly advises supplementing the existing DRMP/DEIS and believes one or more viable, if not superior, alternatives have been omitted from the process. This section is designed to provide specific recommendations on several key issues important to the recreating public. Our recommendations have been made after review of specific written scoping comments obtained by the Utah Shared Access Alliance early on in the scoping process and from review of materials on BLM's RMP website. RMP's identify allowable kinds and levels of recreation to sustain the goals, standards, and objectives that balance the public's recreation demands with the natural resource capabilities within the planning area. These plans help ensure that the public lands are managed in accordance with Federal Land Policy and Management Act and other applicable laws and regulations, under the principles of multiple use and sustained yield; in a manner that recognizes the Nation's need to preserve and protect certain public lands in their natural condition, to provide food and habitat for fish and wildlife and domestic animals, to provide for outdoor recreation, human occupancy and use and for domestic sources of minerals, food, timber, and fiber; all in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water, and archaeological values. Admittedly, that's a tall order. The primary tool BLM uses within land use plans to accomplish these objectives is a Land Use Allocation (LUA). BLM describes a LUA as: The identification in a land use plan of the activities and foreseeable development that are allowed, restricted, or excluded for all or part of the planning area, based on desired future conditions. BLM may use a variety of "tools" to make recreational use allocations. Many, if not all are used in the DRMP/DEIS. For example, Recreation Opportunity Spectrum (ROS), Special Recreation Management Area (SRMA), OHV designations, etc. The DRMP/DEIS does not make effectively use of these 'tools', however. -The DRMP/DEIS does not adequately define or describe the desired future condition. The ROS inventory is flawed, out of date and conflicts with existing recreation management. The SRMA management goals and objectives aren't well defined and activity plans have not been prepared. Additional 'designations' such as "High Use Areas" and ACEC's overlap and provide different and sometimes inconsistent management. In the Preferred Alternative, each of these additional 'designations' also appear to require separate activity plans. BRC/USA-ALL believes that if the agency wishes to push ahead to a Final Plan without additional analysis the Final Plan must clearly define the Goals and Objectives that address issues raised in the scoping process. These recommendations attempt to do that.	dispersed camping in the Price Field Office. Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and designated sites. Vehicle camping outside the identified recreation management zones within the San Rafael Swell SRMA would be allowed in areas that have had traditional vehicle camping use (except where critical resources exist) in order to protect resources and provide for a sustainable and enjoyable experience for all user groups and to accommodate the recreation opportunity spectrum. Group size limits identified in the DRMP are only for areas outside the recreation management zones and requiring SRPs for noncommercial, organized groups is provided for in the FLREA (Federal Lands Recreation Enhancement Act) and in BLM's recreation regulations at 43 CFR 2932. Text has been changed for the Propose RMP/Final EIS to establish thresholds when organized groups are required to contact BLM (>14 people in WSAs, >24 elsewhere) and establish criteria for when permits would be required (see Appendix J). The number of dispersed sites that will be designated outside the recreation management zones will be determined at the time the San Rafael SRMA activity plan is completed.

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	Form Letter	Recreation	General recommendations regarding recreation management; RE: Group Size Limits and Special Recreation Permits: Utah's families are notably larger than most. It's not unusual to find family gatherings including 50 persons or larger. It is most important that land use plans do not unnecessarily or arbitrarily limit recreational use by family groups. This is most important in the PFO, where "Easterin" is a firmly established socio-economic phenomenon. BRC/USA-ALL objects to the manner in which large groups are limited to "Large Group Areas". We implore the planning team to visit these areas and ask if they have the same features as areas that are currently used by large groups (i.e. Head of Sinbad campsites). The large group area recently designated pursuant to the Temple Mountain – Southern Reef Recreation Site Development project (EA UT-070-2003-02) is way too small for the level of use it currently receives. This will present numerous management problems and will result in displacement of existing use into other areas not yet impacted. Limiting large groups to these few areas will unfairly and negatively impact organized OHV groups. The same is true for the group size restrictions outlined in the San Rafael SRMA in the action Alternatives. The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Recommendations: Group size limits should not be specific to ROS determinations as is specified in all action alternatives. The PFO is encouraged to develop a simpler, easier to comply with group size limit policy that will be consistent across SRMAs and other management areas. A single group size limit for the entire PFO is recommended. Special Use Permit regulations and implementation of those regulations must be clarified in the Final Plan so that an average Utah family does not have to secure a permit, obtain insurance or pay a fee for simple family outings. The Special Recreation Permit process must be implemented in such a way that a quick visit to BLMs website will enable people to determine if a permit is necessary, what the fees will be and what the stipulations will be required. The process outlined in the DRMP/DEIS (appendix 14) is extremely confusing and puts the onus on the recreating public to determine if their activity will have a low, moderate or high impact on resources such as soils, vegetation and "environmental effects"(?). Specific recommendations regarding dispersed camping: Dispersed Camping is extremely popular and is a	See general comment responses #15, #50 and #81. The Proposed RMP would not reduce dispersed camping in the Price Field Office. Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and designated sites. Vehicle camping outside the identified recreation management zones within the San Rafael Swell SRMA would be allowed in areas that have had traditional vehicle camping use (except where critical resources exist) in order to protect resources and provide for a sustainable and enjoyable experience for all user groups and to accommodate the recreation opportunity spectrum. Group size limits identified in the DRMP are only for areas outside the recreation management zones and requiring SRPs for noncommercial, organized groups is provided for in the FLREA (Federal Lands Recreation Enhancement Act) and in BLM's recreation regulations at 43 CFR 2932. Text has been changed for the Proposed RMP/Final EIS to establish thresholds when organized groups are required to contact BLM (>14 people in WSAs, >24 elsewhere) and establish criteria for when permits would be required (See Appendix J). The number of dispersed sites that will be designated outside the recreation management zones will be determined at the time the San Rafael SRMA activity plan is completed. Chapter 2 of the Proposed RMP/Final EIS states as an objective development of a transportation plan within five years of adoption of the RMP; at that time the PFO can choose to incorporate some of the commentor's suggestions on a site-specific basis.

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			valuable social experience that can have positive economic benefits to adjacent communities. Just about every public land user group, from wilderness hikers to OHV users, enjoys Dispersed Camping. The definition of Dispersed Camping should be clearly and concisely described in the plan. From review of the Pre Plan, the AMS and the Scoping Report, the following issues surrounding Dispersed Camping should be addressed in the Final Plan: Human waste, trash, proliferation of both campsites and fire rings, OHV/Equestrian Staging areas and "Social Trails", impacts to archeological sites, impacts to vegetation, camping activities occurring in "inappropriate areas", impacts to wildlife and wildlife habitat. General Management Solutions: Education: Education is an important part of any public land management issue and must be incorporated into Dispersed Camping management. Public Information: Information is similar to, but not the same as education. There is a need to provide information on a) where Dispersed Camping is encouraged; and b) specific rules for specific areas (i.e. no firewood cutting, seasonal restrictions on campfires, porta-potty requirements etc.) Use Pattern Information: Managing camping requires a fairly complete understanding of who, what, when and where. Often, land managers lack this information. The Final Plan should identify inventory and use pattern information needs and set objectives for meeting those needs. Campsite analysis: This is also important for Dispersed Camping management. This is best described as being a judgment of "risk v. value" or "opportunity v. trade-off" for each campsite. Mitigation: Many problems associated with Dispersed Camping can be resolved with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access "routes") • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing "impacted areas" and limiting use to those areas. (Identifying currently used sites and 'marking' them by permanent fire rings or signage) • Appropriate buffer from streams and lakes. (Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation) • Archeological clearance • Sustainable signing. (If possible, all signing should be literally bullet proof) The Final Plan should include the following Goals and Objectives for Dispersed Camping: Goal: Manage Dispersed Camping use on public lands and National Forests in such a manner that maximizes economic opportunity for adjacent gateway communities while minimizing the impact to overall forest and rangeland health, vegetation and wildlife.	

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			Objectives: • Identify and map roads and trails that tie to adjacent communities where food, lodging, fuel and other goods and services may be found. This should be accomplished during OHV route designation process. • Identify areas where local communities may post information regarding where goods and services are available in adjacent communities. This should be accomplished during the OHV route implementation process. • The Special Recreation Permit application process should be made as streamlined as possible so that large groups may be able to camp in appropriate areas. Annual review is suggested for modification of permitting process. • BLM will pursue partnerships and grants for developing logical Dispersed Camping management to help mitigate budget constraints. • Where compatible with reasonable conservation measures, access to campsites will be maintained in areas offering the opportunity to see wildlife and view scenic vistas. This should be accomplished during the OHV Route Designation Process. • Dispersed Campsites and Dispersed Camping areas shall be located to minimize significant damage to soil, watershed, vegetation, wildlife or other resources. • Dispersed Campsites and Dispersed Camping areas shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of Dispersed Camping opportunities that fulfill the experience desired by family outings. Objectives: • Travel maps will identify Dispersed Campsites and Dispersed Camping areas that can used by families and/or large groups. This should be accomplished in the OHV route implementation process. • Spur routes will be designated for motorized access to Dispersed Campsites and other destinations such as scenic overlooks, viewing historic and cultural resources etc. This should be accomplished during the OHV Route Designation process. Goal: Actively manage Dispersed Camping in order to ensure an extensive opportunity that satisfies the experience desired by a wide range of recreationists while minimizing impacts. Objectives ; • Develop best practice models for campsite maintenance, management and development. • A complete and accurate inventory of existing campsites will be completed to support sustained management. • Standardized signing on the ground will be implemented throughout land management designations i.e. SRMA, ERMA, ACEC etc. • Maps will be easily available and contain standardized information proper camping etiquette and certain site specific restrictions • Partnerships will be developed with user groups to enhance education, safety, ethics, user sharing, conservation and compliance. • Campsites, when closed, will be signed with an official, legitimate reason. Monitoring should be implemented to	

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			justify the reasons stated. • Emphasis should first be given to maintenance, reconstruction, and relocation of existing campsites before closures are considered. • Proper education programs and service programs must be an important focus of all recreation management. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. Goal: Minimize impacts and conflicts from Dispersed Camping associated with OHV use by mitigation efforts as well as maximizing the dispersal of OHV staging areas and providing intensive OHV staging areas where it makes sense on the ground. Objectives: • BLM will identify and designate OHV staging areas and trails or “tot lots” for youth activities. This will be accomplished during the route designation process. • BLM will clearly delineate access to campsites to reduce proliferation of “social trails”. This will be accomplished during implementation of the route designation process. Goal: Enhance public land visitor accountability and responsibility so impacts to resources are minimized, campsites remain clean and fire rings do not proliferate. Objectives: • BLM will provide educational and informational materials for distribution to visitors. Information should be available at Kiosks and where major roads provide access to public lands. • BLM will attempt to educate recreationists on the potential resource impacts and user responsibilities when engaged in Dispersed Camping use through partnerships with user groups, other agencies and the formal education system. Goal: Attain resource sustainability goals by using mitigation instead of closure. Objectives: • Develop best practice models for campsite maintenance, management and development. • Resolve problems associated with Dispersed Camping with mitigation measures. Such measures may include, but are not limited to: • Site hardening (engineering campsites so that erosion is limited or eliminated) • Engineering access to campsites. (providing access to campsites that can be sustained and eliminating multiple access “routes”) • Containment (structures such as fences or rocks that limit the expansion of disturbed area near campsites) • Identifying existing “impacted areas” and limiting use to those areas. (Identifying currently used sites and	

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			'marking' them by permanent fire rings or signage) • Applying appropriate buffer from streams and lakes. Not every campsite that is adjacent to a water body is causing problems. Management should be flexible enough to allow camping in areas near water that is sustainable and not causing any undue degradation. • Archeological clearance • Sustainable signing.	
	Form Letter	Recreation	Recreational and family values benefits: Goal: Through comprehensive inventories and detailed, yet understandable, mapping, provide a range of OHV trail riding opportunities that fulfill the experience desired by family outings. Objectives: • Identify as many routes as possible that may be used for Jamborees and other organized events. This should be accomplished in the OHV Route Designation Process. • Identify areas suitable for large family gatherings. This should be accomplished in the OHV Route Designation Process. • Identify areas suitable for large family gatherings along OHV routes. This should be accomplished in the OHV Route Designation Process. • Identify areas where large groups can stop for lunch, view scenic overlooks etc. This should be accomplished in the OHV Route Designation Process. Recreation: Goal: OHV use is recognized as an acceptable use of the Public Lands. The goal should be to use proven recreation management principles to manage vehicle-based recreation that is sustainable, manageable and enjoyable. Objectives: • Routes should be designated that provide a variety of difficulty. • Routes should be designated that provide a variety of experiences. • Routes should be designated that provide opportunity for a variety of vehicle types. • Routes should be designated that provide access to destinations. • The integrity of the "loop" trail system should be maintained. Loop trails offer trail users a more desirable recreational experience. • Spurs are suitable for destination features such as scenic overlooks, campsites, viewing historic and cultural resources etc. • These objectives should be accomplished during the OHV route designation process.	See general comment responses#15, #19, #79 and #81. Chapter 2 of the Proposed RMP/Final EIS states as an objective development of a transportation plan within five years of adoption of the RMP; at that time the PFO can choose to incorporate some of the commentor's suggestions on a site-specific basis. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. Table 2-15 and Appendix J in the Proposed RMP/Final EIS provide the description of permit requirements for organized groups and the criteria for evaluating whether a permit is required.
	Form Letter	Socioeconomics	Economics: Goal: "Manage OHV use in a manner that maximizes economic opportunity for adjacent gateway communities	The Proposed Plan/Final EIS evaluates a range of alternatives in detail to assure a balanced approach was recommended that allows BLM to protect the

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			while minimizing the impact to overall rangeland health, vegetation, wildlife and other visitors. Objectives: • When possible, route OHV routes into adjacent communities. This should be accomplished during the route designation process. • Identify areas where local communities may post information regarding goods and services are available. This should be done during the OHV route implementation process or as needs arise. • Identify as many routes as possible that may be used for Jamborees and other organized events. This should be done during the route designation process. • Streamline the Special Recreation Permit application process. This should be accomplished immediately after the RMP is final. • The District Manager should make all site specific project level planning decisions as consistent as possible to the plans of adjacent communities.	resources and resource uses. The management actions outlined in the Proposed Plan will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Several of the commentor's suggestions are site-specific and beyond the range of alternatives typically considered in landscape-level plans such as the current RMP. Chapter 2 of the Final EISs states as an objective development of a transportation plan within five years of adoption of the RMP; at that time the PFO can choose to incorporate some of the commentor's suggestions on a site-specific basis. The streamlining of the SRP process that the commentor requests is beyond the scope of the Proposed RMP/Final EIS. Chapter 5 of the Proposed Plan/FEIS provides detail on the degree of conformity with local plans, including counties.
	Form Letter	Transportation and Access	Access for physically challenged Goal: Provide a reasonable range of access opportunity to see the backcountry through OHV use by youth, the aging population and the physically handicapped. Objectives: • Primitive ROS should be designated only where existing uses are compatible, leaving as much of the planning area open for access by the disabled via vehicles. This should be accomplished whenever changes in ROS are contemplated. • Where appropriate, facilities should be constructed that are disabled access friendly.	Please see general comment response #80. Chapter 2 of the Proposed RMP/Final EIS states as an objective development of a transportation plan within five years of adoption of the RMP; at that time the PFO can choose to incorporate some of the commentor's suggestions on a site-specific basis.
	Form Letter	Transportation and Access	Dispersal: Goal: Closures are eminent in some areas and existing motorized will be displaced to other areas. In order to minimize impacts to the remaining roads, trails and areas open for OHV use the plan will allow for additional access and additional recreational opportunities in suitable areas. Objectives:	The DEIS evaluated a range of alternatives in detail to assure a balanced approach was recommended that allows BLM to protect the resources and resource uses. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels recreation.

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			• Keep as many routes open for motorized use • As appropriate, disperse all forms of recreational use in order to minimize impacts in any particular area• Disperse all forms of recreational use so as to minimize conflict and create a more desirable experience	
	Form Letter	Recreation	Section 1.3 (page 1-2): The "Description of the Resources and Study Area" is inadequate and must be revised. The DRMP/DEIS contains much to be disappointed in, from our perspective. This section stands out. One would think that with all the flowery descriptions of the PFO the BLM has released in various news releases, publications, websites etc., the planning team would come up with something better than this. A voluminous description is not necessary, but BLM should at least attempt to describe for the general public what resources exist within the PFO. Section 2.8.3 "Recreation": BLM describes actions common to all Alternatives. The first bullet point reads: "Recognize that various levels of regulations and limits are necessary. Restrictions and limitations on public uses should be as small as possible without compromising the primary goal." This is a remarkable statement in light of the significant restrictions imposed across all Alternatives. Section 2.8.3 "Recreation": BLM describes actions common to all Alternatives. The second bullet point reads: "Where long-term damage by recreational uses is observed or anticipated, limit or control activities through specialized management tools such as designated campsites, permits, area closures, and limitations on number of users and duration of use. Revise recreation management plans and management framework plans when they prove to be either overly restrictive or inadequate to maintain public land health." BRC/USA-ALL strongly objects to this and recommends its revision. The term "long-term damage" is not defined. Implementing management actions on the anticipation that "long-term" damage may occur is inappropriate. BRC/USA-ALL recommends this "bullet" be revised with the following: Recreational activities should be managed to minimize damage to soil, watershed, vegetation, air, or other resources. Section 2.8.3 "Recreation": BLM describes actions common to all Alternatives. The fourteenth bullet point reads: "Campgrounds and dispersed camping areas in SRMAs could be closed seasonally or as impacts or environmental conditions warrant." Incorporating this into the RMP is redundant and unnecessary. BLM has all the necessary tools to seasonally adjust use "as conditions warrant". Incorporating this section into the RMP will lead to unnecessary and arbitrary closures. BRC/USA-ALL recommends the removal of this "bullet". Soil, Water, and Riparian Resources: Under Establishment of Buffer Zones for No Surface Disturbance around Riparian-Wetland Habitats within Alternative C, new surface disturbance would be prohibited within the 100-year floodplain or within 100 meters on either side of the centerline along all perennial and intermittent streams. We strongly object to the application of this decision to intermittent streams. An intermittent stream in Utah can sometimes consist of a drainage that carries storm water only once per year. BLM should eliminate the provision for intermittent streams.	The Draft and Final EISs evaluate a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of recreation/OHV activity. Additionally, as activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents. Rationale for selection of the RMP will be included in the Record of Decision (ROD). As discussed in Section 2.16 of the Draft RMP/EIS, riparian areas would be managed to attain Proper Functioning Condition (PFC) through whichever action is necessary as determined in site-specific plans and actions (AMPs and HMPs, livestock grazing vegetative use levels, grazing timing and intensity, etc.) Water quality standards are the responsibility of the State of Utah through the Department of Environmental Quality (DEQ). BLM works to maintain healthy vegetation and soil conditions, which in turn help in the retention and filtering of water resources. In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix 26 of the Draft EIS and Appendix L of the Proposed RMP/Final EIS.

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			Appendix 8 includes a seasonal restriction of April 15 through August 1 in high-value breeding habitats for neotropical migratory birds. Nice try. According to the Utah Division of Wildlife Resources website, the entire PFO is either critical value or high value habitat for neotropical migratory birds. As such, every square inch in the PFO could be designated as high-value breeding habitat. The analysis in Chapter 4 should provide the nexus between on the ground condition, current management and alternative chosen. The analysis should be supported by evidence. The DRMP/DEIS fails to provide analysis that will provide context and describe impacts in sufficient detail for public and decision makers to reach conclusions about the alternatives. The analysis of the impacts in the document fails to be compared and contrasted to analysis of the environmental effects of natural events including floods, wildfires, drought etc. Environmental analysis must not be pre-occupied with documenting what can be presently observed on the ground (at various points in time) while ignoring the legally relevant issue of whether on-the-ground conditions constitute significant impacts to the human environment. Trend and condition analysis is meaningless without comparison of baseline condition/degree of change and establishment of the "significance threshold". BRC/USA-ALL recommends revision of the "Significance Criteria" in the document. Better significant criteria would be indicators that can be quantified by a unit of measure. For example: number of campsites open vs closed, number of miles of routes open vs closed. Or miles of routes available for OHV recreation. Or number of loops available. Number of visitor days lost due to management actions etc. The BLM needs to identify the impacts – then -- quantify and qualify significance. Establish such thresholds on which significance can be judged (or determined). When formulating analysis BLM must ask: does analysis give enough information to make that determination? Is it possible to make comparisons against the baseline data? Additional ACEC's: Simply put: there is no need. We object to the proposal to designate additional ACECs because BLM has failed to identify a prevailing need to protect significant values associated with these areas. No justification is given regarding fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened resources in proposed ACEC's. Designation of additional ACEC's (below) is arbitrary and capricious. BRC/USA-ALL strongly opposes any ACEC designated for "Natural Process". BLM lacks authority to manage for subjective resources such as "natural process".	FLPMA specifically uses the term "natural systems" in its definition of ACEC. The FLPMA definition of ACEC as an area "within the public lands where special management attention is required (when such areas are developed or used, or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes (emphasis added), or to protect life and safety from natural hazards" (FLPMA Sec. 103(a)).
	Form Letter	ACEC	Designate citizen proposed wilderness areas as semi-primitive non-motorized to protect them as such. Beyond that, the BLM has the obligation, as protectors and managers of our nation's precious landscapes, to designate lands that contain significant cultural, geologic, scenic, recreational, and plant and wildlife habitat as Areas of Critical Environmental Concern (ACECs).	Wilderness Study Areas are managed as outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review. All of the alternatives analyzed in the Proposed RMP/Final EIS strictly adhere to this policy and are compatible with meeting the goals and objectives for WSAs. The Supplement to the Draft Resource Management Plan/Draft Environmental Impact

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				Statement describes and analyzes the impacts of Alternative E which would manage the public lands administered by the Price Field Office with an emphasis on protection of non-Wilderness Study Area (non-WSA) lands with wilderness characteristics. Section 4.2.11 of the Proposed RMP/Final EIS is an expanded analysis of impacts on 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 for relevance and importance (see Appendix L in the Proposed RMP/Final EIS) which do not include wilderness characteristics. Also see general comment response #141.
	Form Letter	Fire and Fuels Management	(2.2.10) You need to control the spread of pinion-juniper and do a better job on burning and habitat management of these species.	The Draft RMP/EIS, page 2-31, addresses limiting the expansion of pinion-juniper (P/J) woodlands toward its approximate historic range. Fire and fuels management will help reduce P/J woodlands encroachment when its density threatens other resource values.
	Form Letter	Fire and Fuels Management	Alternative D, with added language: Recognizing prior existing rights and grazing preference, manage land uses within occupied and historic prairie dog colonies to preserve the habitat values of these limited but crucial value habitats, while complying with latest Executive Orders on this issue. Habitat Manipulation for Fish Population Maintenance, Recovery, and Enhancement, Alternative D with added language: BLM would coordinate with UDWR to implement habitat improvement efforts to establish fisheries with native and nonnative fish species, Recognizing prior existing rights for beneficial use of water under state law.	Please see general comment response #103
	Form Letter	Lands and Realty	(2.8.1) Land for trade with Hunt oil -UDWR -BLM is not consistent with BLM policy. The access to thousands of acres will be lost to public access. The only way to trade these lands is to guarantee access to the traded lands.	The Hunt Exchange proposal is outside the scope of the Price RMP because the RMP is an umbrella document that provides guidance for broad areas of action. It does not approve specific actions such as this specific exchange proposal. The specific actions in this area would require an individual environmental assessment before approval of the proposal.

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				However, the Hunt Exchange proposal is currently being examined in a feasibility report. If the decision is made to process the exchange, an environmental assessment would be prepared to analyze the potential impacts of the exchange, and the public would be afforded opportunities to comment. Section 2.8.4 of the Draft RMP/EIS and Table 2-16 of the Proposed RMP/Final EIS (Actions Common to All Alternatives, Lands and Realty) describe the conditions under which lands may be transferred from Federal ownership or leased.
	Form Letter	Livestock Grazing	Add to the front of the next to the last sentence: BLM will continue to monitor with utilization and trend studies, to identify and address in cooperation with the permit holder any instances of resource degradation occurring in site-specific areas. Degradation, particularly associated with seasons of use and forage allocation, will also be addressed when identified on an allotment level basis. This RMP will also ensure resolution of rangeland health concerns by addressing the following: etc.	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.
	Form Letter	Livestock Grazing	Evaluate forage needs for livestock, and readjust wildlife, and wild horses and burros numbers to maintain the historic AUM levels; and balance wildlife habitat needs for protection of riparian and watershed values: Add 3rd bullet to read: a.. Work with grazing permit holders as outlined in the Memorandum of Understanding concerning cooperative rangeland monitoring enacted by the BLM , NCBA and PLC to improve quality and quantity of short and long-term allotment level monitoring information from which to make decisions.	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

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				plan conforms to manual requirements and is subject to change as new data are assimilated.
	Form Letter	Livestock Grazing	a. Manage and mitigate activities to restore, sustain and enhance domestic livestock rangeland health, the health of plant associations, b. Enhance and restore native and naturalized plant species, and enhance biological and genetic diversity of natural ecosystems. c. Ensure that the amount, type and distribution of vegetation on public lands produces the kind, proportion and amount of vegetation necessary to enhance rangeland health to support the maximum number of domestic livestock AUM's and to meet or exceed other management objectives for a given vegetative community. d. Protect areas with relict vegetation without negatively impacting the historic levels of domestic livestock AUM's in Grazing Districts."	Poor grazing management practices can cause the effects described in the comment. Other uses can also contribute to these problems. The BLM through its laws and regulations will take actions to prevent or correct such problems. The proposed action provides for changes in grazing management at the implementation phase of the RMP in cooperation with the permittee and other interested publics. Under Subpart 4180 of the grazing regulations, BLM must manage grazing, which includes rest from grazing where appropriate, in a manner that achieves or makes progress towards achieving, standards for rangeland health. These standards have been developed on a regional basis and address watershed function, nutrient cycling and energy flow, water quality, habitat for endangered, threatened, proposed, candidate or other special status species.
	Form Letter	Livestock Grazing	a. Manage grazing and allotments using the Public Rangeland Improvement Act and the Taylor Grazing Act, adhering to recent court decisions, applicable executive orders and county and state plans.	This RMP acknowledges livestock grazing as a valid use of the public lands and provides for sustained grazing use through management decisions in compliance with law, regulation and policy. This includes designating which public lands are and are not available for livestock grazing, pursuant to 43 CFR 4130.2(a). Additionally, the Proposed RMP addresses the permitted use on those allotments that are available for livestock grazing per BLM Handbook 1601, Appendix C page 14.
	Form Letter	Livestock Grazing	To allow purchasing of livestock AUM's for the specific purpose of using the forage for wildlife use is in opposition to 10th circuit court decision. Alternative D should be amended to state Congressional intent. Add: When monitoring data and best science identify an increase in available forage which are in Taylor Grazing Act grazing districts, such increase will first go to restore domestic livestock AUM's to levels historically designated when the grazing district was established, then any excess available forage will be reasonably allocated between livestock and wildlife. For increases in available forage in areas, which are not in grazing districts, allocations would be adjusted proportionately among wildlife and any permitted livestock use in the area. When monitoring data and best science identify a decrease in available forage in areas, which are in Taylor Grazing Act grazing districts, such decrease will first be allocated to livestock in order to favor retention of livestock AUM levels in keeping with the Taylor Grazing Act preference. For decreases in available forage in areas, which are not in grazing districts, allocations would be adjusted proportionately between wildlife, and any permitted livestock use in the area.	Please see general comment response #82

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	Form Letter	Livestock Grazing	Goals: Appropriate. Manage public lands to provide forage and management facilities for domestic livestock. Actions Common to All Alternatives: Add the following language to make this Appropriate: Manage grazing and rangeland health according to the Standards for Rangeland Health and Guidelines for Grazing Management for BLM Lands in Utah, based on documented historical use and dependent on the availability of forage and water. Require livestock trail permit for any trailing activity that occurs on BLM-administered lands. Offer for application to graze, unallocated lands as available for livestock grazing unless documented and validated scientific monitoring shows that due to terrain, soils, vegetation, that the land is no longer chiefly valuable for grazing and removed by appropriate statutory authority. Management decisions will be pursuant to the Taylor Grazing Act, and CFR 4100.	The Common to All Alternatives for Livestock Grazing section of the Proposed RMP/Final EIS addresses this issue.
	Form Letter	Livestock Grazing	Lands no longer available for Livestock Grazing-Program Summary Update, Allotment or area: Purposes: Buckhorn Draw Recreation, cultural resources Wildlife Allotment Wildlife Gray Canyon Wild life Management Area Wildlife habitat and forage; enhancement of wild land values including recreation, riparian, and wildlife, Horseshoe Canyon South Allotment Vegetation enhancement; soil stabilization and erosion reduction; additional protection of portions of critical watersheds and critical soils; additional wildlife habitat protection and reduced competition for available food, space, cover, and water; maintenance or enhancement of high-value recreational lands and existing recreational opportunities: We suggest placing in this summary, the number of AUM's for each allotment, and the acreage involved next to the allotment name, to show the actual loss of active AUM's in the grazing district. We submit that before land in a grazing district becomes "no longer available for grazing," BLM has the burden to show by documented monitoring and scientific data that the health or other factors of this land will no longer support livestock. BLM should also attempt to mitigate the loss pursuant to Sec 4110.3-2 (b) and, or Sec.4110.3-3 (a) Implementing reductions temporary closure in permitted use. The TGA adequately addresses temporary reductions or closure due to certain conditions making the removal grazing un-necessary.	The suggestion has not been incorporated into the Proposed RMP/Final EIS because the decision was made prior to the RMP revision and it is not a decision being changed through the revision process.
	Form Letter	Livestock Grazing	Range Creek and Buckskin Allotments: Forage in the Range Creek allotment would be allocated to other resource uses. (Refer to wildlife section concerning combining the Range Creek Allotment with the Grey Canyon WMA). This action is not consistent with Utah Cattlemen's resolutions. We suggest that the Range Creek Allotment be put out to application by a local rancher, to conform with the intent of the TGA. The added AUM's could accommodate a rest rotation program throughout the area. This action would include much more land than just the allotment. Both public and private land would be involved, enhancing rangeland health for both wildlife and livestock in a larger area. It would also allow continuing stewardship to maintain range improvements, which benefits wildlife all year. In good years it would allow UDWR and BLM to increase wildlife numbers, without AUM reduction or relinquishment.	The portion of the DEIS referred to in the public comment (page 2-58) has been changed in the Proposed RMP/Final EIS. In alternative D, the Buckskin allotment would remain open for livestock grazing in conjunction with other private land in the allotment. The Range Creek allotment would remain open for livestock use upon development of a prescriptive management plan including UDWR lands that would provide for wildlife objectives cooperatively developed by BLM and UDWR.
	Form Letter	Livestock Grazing	Forage in the Buckskin Allotment would be allocated to other resource uses. (56 AUMs): This action is not	The portion of the DEIS referred to in the public

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			consistent with Utah Cattlemen's resolutions. The private land that this allotment is attached to is being considered for yet another land trade and it would be consistent with the TGA to have these AUMs stay in private livestock use.	comment (page 2-58) has been changed in the Proposed RMP/Final EIS. In the Proposed RMP, the Buckskin allotment would remain open for livestock grazing in conjunction with other private land in the allotment.
	Form Letter	Livestock Grazing	"Criteria for Voluntary Relinquishment and Disposition of Grazing Permits or Grazing Preference": page 2-58: STATES: Provide for the voluntary relinquishment of grazing permits by willing permittees. Upon relinquishment, the BLM would consider reallocating livestock AUMs for other uses, for the life of the plan, after determining the lands are no longer "chiefly valuable for grazing and raising forage crops." The following criteria would be considered when making this determination. This list is not all-inclusive and the presence or absence of these criteria are not binding on the BLM to make a decision that an area or allotment is no longer "chiefly valuable for grazing and raising forage crops." Relinquishments may be developed through a subsequent land use plan amendment. We will actively oppose this proposal at all levels. The following underlined portions are a rebuttal view to the six criteria for relinquishment: 1. Other uses of the land serving public benefit; Grazing Preference is not subservient to other uses. The US Supreme Court concluded that, under the existing regulations, "a permit holder is expected to make substantial use of the grazing permit and that "the Secretary has represented to the Court that '[a] long-standing rule requires that a grazing permit be used for grazing.'" Slip Op. at 18-19. 2. Adverse terrain characteristics such as steep slopes. Even in an allotment with steep slopes, wildlife will still be able to forage these slopes whether livestock is present or not. 3. Sensitive soil, vegetation, or watershed values; It is our contention that all of these potential threats to the health of the land increase when grazing is removed, however since monitoring stops when grazing is removed, no one knows. 4. Presence of noxious or poisonous weeds and other undesirable vegetation 80% of noxious or poisonous weed management in Utah is done by farmers and ranchers, and with personal funds, or program money, that only they are eligible to receive. 5. Presence of other resource values that may require special management/ protection; It is our contention that most resource values are managed better with grazing present. The need for establishing grazing reserves. The Utah RAC removed this issue during the hearings on the Sustaining Working Landscapes Initiative last year, making this an inappropriate decision, without policy support. This addition to a DEIS for an RMP whose demeanor reflects a direct bias against livestock grazing for a reasonable person reading the document, suggests an agenda. Your prompt reconsideration of this action would be in order. We expect that a review of current federal statutes will convince BLM at all levels of your tenuous position. Desolation Canyon/Green River Corridor (Sand Wash to Swasey's Rapid) pages 2-58, 59: Alternative A should be the Preferred Alternative. Grazing (horses and cattle) would continue in this area as currently allocated. (It should be noted that these allotments have not been actively grazed with cattle for 15	See general comment response #82. BLM amends or revises land use plans under the planning regulations (43 CFR Part 1600) and the BLM land use planning handbook. An offer of voluntary relinquishment of a grazing permit (and preference) for purposes of furthering a proposal to amend a land use plan to provide for the closure of an area to livestock grazing is not recognized and valid and the BLM is not bound by such conditions. The voluntary relinquishment is not a permanent contractual relationship between the entity relinquishing the permit and BLM. Even if BLM amends the land use plan and effectively closes the area to grazing for the immediate or foreseeable future, this action can be amended or reversed under subsequent BLM planning and decision processes.

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			years (portions of the Rock Creek allotment were grazed by horses in 2002). Grazing allotments shall be made available for application for use by a livestock operator. The Utah Cattlemen's understand that Carbon County has declared a policy of no net loss of private lands, grazing permits, animal unit months, mineral claims or water rights, and the resultant loss to the tax base. Any other alternative on this action is also not consistent with Utah Cattlemen's Resolutions.	
	Form Letter	Livestock Grazing	Forage Allocation Within Lands Acquired After Adoption of the PFO/RMP: page 2-61: Alternative B is preferred with added language: Lands acquired after adoption of this plan would be managed consistent with the historic use or the purposes for which it was acquired. Grazing should be used, if not acquired for that purpose, to assist in rangeland management using best management practices.	Regarding forage allocation on newly acquired lands, the allocation of additional forage available would be considered a planning decision by the BLM. Therefore, it would be appropriate for the BLM to consult, cooperate, and coordinate with the interested public, as well as affected permittees, lessees, and the county and state, before issuing a proposed decision allocation of forage on newly acquired lands.
	Form Letter	Livestock Grazing	No action Alternative is preferred. Access for existing and future range projects would continue to be allowed on an allotment basis. Chapter 1, Planning Criteria 1.5, Page 1-7, states, "BLM will continue to consider administrative access on a case-by-case basis." Permits have been relinquished or removed from grazing that have not been reallocated. The following allotments have had grazing removed or reduced for the listed reasons: page 2-62: Bunderson, Case, Ferron Mills, Peterson, Rimrock, Wattis,	These allotments have been removed from the Proposed RMP/Final EIS because under the Proposed RMP BLM would not to move forward with any reallocation of AUMs from these allotments. See general comment response #82.
	Form Letter	Minerals and Energy Resources	Protect the 2.5 million acres managed by BLM Price FO, especially the 1.5 million acres covered by the Redrock Wilderness Act, from oil and gas development and its irreversible harms. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development.	The supplement to the Price Draft RMP/EIS for non-WSA lands with wilderness characteristics (September 2007) analyzes protective management for all of these areas. See general comment responses #36 and #101
	Form Letter	Minerals and Energy Resources	I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. Allowing companies to lease, explore for oil and gas, and ultimately develop these lands, ruins the stunning scenery of this unique area, degrades water quality, causes harmful soil erosion, endangers wildlife habitat, and destroys rare but essential riparian areas that should be protected.	The supplement to the Price Draft RMP/EIS for non-WSA lands with wilderness characteristics (September 2007) analyzes protective management for all of these areas. See general comment responses #36 and #101
	Form Letter	Minerals and Energy Resources	In addition to irresponsible ORV management, the BLM is irresponsibly leasing for oil and gas in the Book Cliffs. The BLM is focusing on leasing in pristine wilderness quality lands even though the Book Cliffs are not believed to contain meaningful recoverable energy reserves (www.redrockheritage.org/oilandgas1: U.S.G.S. Table 1)	Please see general comment responses #18, #36 and #101.
	Form Letter	Minerals and Energy Resources	Oil and gas development should be restricted to remote areas away from recreation areas.	Please see general comment response #18
	Form Letter	Minerals and Energy Resources	The Green river corridor should have a minimum set back of 5 miles and zero visibility and zero noise pollution from the river. Deso/Gray and Labyrinth canyons should have a minimum set-back of 10 miles.	The Price RMP provides management prescriptions that allow for multiple use and flexibility while protecting unique resources found in the area. The Proposed RMP is intended to provide for protection of the resources but still provides the flexibility to allow multiple uses within the planning area. Travel

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				management activity planning would include public involvement to analyze the level of detail described in this comment. Extensive land use restrictions are proposed in the DEIS for Gray Canyon WMA, Labyrinth Canyon SRMA and Desolation Canyon SRMA. Recreation use would be aggressively managed to meet the goals and objectives of these areas. Both the Gray Canyon WMA and the Desolation Canyon SRMA would be closed to OHV use and designated as NSO areas for oil and gas leasing (DEIS, Pgs. 2-41 and 2-69). An activity plan for the Labyrinth SRMA would be developed to address prescriptions for: SRPs, camping regulations, travel planning for all uses, and carrying capacity. This area would also be designated as an NSO area for oil and gas leasing (DEIS, P. 2-74). These restrictions are adequate to protect the sensitive resource values within these areas.
	Form Letter	Minerals and Energy Resources	In the Draft Price RMP, the BLM currently proposes leaving 98% of wilderness-quality lands (outside of already protected wilderness study areas) open to oil and gas drilling, leasing and development, despite the fact that the U.S. Geological Survey estimates that oil and gas deposits under America's redrock wilderness would amount to a mere 4 days worth of oil and less than 4 weeks worth of natural gas.	Please see general comment response #101
	Form Letter	Minerals and Energy Resources	BLM needs to redraft the Reasonable Foreseeable Development to comply with BLM policy and realistically address the development potential in the planning area.	Please see general comment responses #49 and #53
	Form Letter	Minerals and Energy Resources	BLM needs to fully analyze the socioeconomic impact of the restrictions placed on oil and natural gas development within the planning area.	The Proposed RMP/Final EIS Section 4.6 includes additional information on impacts of the alternatives on socioeconomic conditions in the planning area. See general comment response #132.
	Form Letter	Minerals and Energy Resources	I am concerned that the RMP's preferred alternative leaves Nine Mile Canyon open to further industrialization. Allowing non-surface occupancy resource extraction in this area has great potential for damage to priceless Native American cultural and spiritual sites. Drilling under the ground toward the canyon bottom could disturb the known 10,000 petroglyphs, not to mention areas of rock art which have not been discovered yet. Further, the full impact of Nine Mile Canyon to both visitors and Native people cannot be preserved by simply cordoning off known and highly visible rock art panels. Nine Mile Canyon holds the remains of the full spectrum of life as lived by the Fremont and Archaic cultures, and later the Ute tribe, including pit houses and granaries. It is also of ongoing spiritual importance to the Ute and Pueblo people-to Native people, petroglyphs are not just "art" but a direct connection to their ancestors. Drilling should not be allowed anywhere near the bottom or sides of Nine Mile Canyon.	The Nine Mile Canyon ACEC was designed to protect and prevent irreparable damage to extensive and unique cultural resources and wildlife habitat while recognizing valid existing rights. However, the existing environment in Nine Mile Canyon, particularly scattered public lands and a county controlled right of way in the bottom of the canyon that is not subject to BLM management, and extensive previous use for recreation, ranching and mineral development, creates constraints in management options available to the BLM. Management prescriptions have been adjusted accordingly to provide protection for protection of

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				other resources while oil and gas and other development continues on private lands and while providing access to minerals on public lands through directional drilling. In addition, The RMP would implement the 1995 Recreation and Cultural Area Management Plan, as referenced on Draft RMP/EIS page 2-81. In the Proposed RMP, portions of the canyon would be managed as VRM III. Further, those areas where public lands are more consolidated and previous disturbances are reduced would be managed as VRM II. This management would allow the 1995 Recreation and Cultural Area Management Plan to continue to be implemented to "meet or exceed VRM II/III guidelines, as appropriate."
	Form Letter	Minerals and Energy Resources	It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions.	See general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
	Form Letter	Minerals and Energy Resources	After Review of the Price District RMP on oil and gas development, I am concerned the proposed alternative D will reduce jobs in our region and cut tax revenue for schools and local governments in Utah. Oil and gas is vital to our local economies, and although the socioeconomic study tried to capture these issues, the BLM did not incorporate these ideas into any of the alternatives? Please redevelop alternative D for the Price District RMP and demonstrate the socioeconomic impacts that will occur. Our local and national economies are in desperate need of more supplies! We need more natural gas development right now, not more government regulations and hurdles. All the land that can be released for development should be available.	See general comment response #132
	Form Letter	Minerals and Energy Resources	I am becoming more and more concerned with what seems to be negligence regarding our economy in Eastern Utah. Shutting down the drill rigs early this year is already going to cost our economy millions. In addition to that, the BLM has not fulfilled your requirement under the Federal NEPA regulations. For example: How much do the various regulations you are placing on energy development cost our economy? How much money will Huntington lose because the BLM is restricting OHV use on many acres of our public lands? How many millions of dollars will Eastern Utah lose for each gas well eliminated from production? These are fair questions that the BLM is required to answer according to the NEPA regulations. Please provide answers to these questions in the final RMP.	See general comment response #132
	Form Letter	Minerals and Energy	I hope the BLM will bring the economic realities of our region to the forefront in developing a new alternative for	The Proposed Plan/Final EIS evaluates the

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		Resources	the Price District RMP. Alternative D is a good start, but you need to go further in showing us citizens what will happen to our jobs when you limit 1000 gas wells from production?	socioeconomic impacts of having access to BLM lands for multiple uses. This includes the economic contribution of energy production to local communities. A discussion of this analysis is provided in section 4.6. See general comment response #132.
	Form Letter	OHV Route Identification	The BLM should also move promptly to protect the areas where ORV damage is too great, including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	'The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail.
	Form Letter	OHV Route Identification	It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	'The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. Also see general comment responses #19, #36 and #132.
	Form Letter	OHV Route Identification	We would ask and encourage you to help protect the "wilderness characteristics" of this most beautiful part of our natural heritage, especially those areas that qualify for federal wilderness designation.	Please see general comment response #36
	Form Letter	OHV Route Identification	We also urge you to restrict ORVs in the proposed wilderness areas, as proposed by Utah citizens in the "Castle Country Heritage" proposal. My sister told us how ORV routes already run rampant across the desert, marring a great landscape. That would not be allowed here in Maryland.	Please see general comment responses #12 and #35
	Form Letter	OHV Route Identification	Do not designate all these trails as motorized routes, because ORV use can devastate land, vegetation, and wildlife habitat. The land will be ruined for future generations to enjoy. The BLM should complete a comprehensive route designation plan that considers non-motorized users of public land and protects sensitive land areas that will be trashed by continued ORV use. ORVs are not appropriate in citizen-proposed wilderness areas.	The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. Travel management plans that provide for maps, signs, enforcement etc. will be

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				prepared as RMP implementation documents. See general comment responses #19 and #36.
	Form Letter	OHV Route Identification	ORVs are not appropriate in citizen-proposed wilderness areas	Wilderness Study Areas are managed as outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review. All of the alternatives outlined in this plan strictly adhere to this policy and are compatible with meeting the goals and objectives for WSAs. Also see general comment responses #12, #19 and #36.
	Form Letter	OHV Route Identification	There are over 2,500 miles of motorized trails for ORV riders on lands managed by the Price BLM office that are not within proposed wilderness areas. The Citizens' RMP Proposal identifies areas that should be kept motor-free for hikers, backpackers, horseback riders, and other backcountry users.	'The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. 'Wilderness Study Areas are managed as outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review. Cross-country travel is not allowed in WSAs. All of the alternatives analyzed in Proposed RMP/Final EIS strictly adhere to this policy and are compatible with meeting the goals and objectives for WSAs. The Supplement to the Draft Resource Management Plan/Draft Environmental Impact Statement describes and analyzes the impacts of Alternative E which would manage the public lands administered by the Price Field Office with an emphasis on protection of non-Wilderness Study Area (non-WSA) lands with wilderness characteristics including closing the areas to OHV use. Section 4.2.11 of the Proposed RMP/Final EIS is an expanded analysis of impacts on non-WSA lands with wilderness characteristics. Also see general comment responses #12, #19, and #36.
	Form Letter	OHV Route Identification	The Price BLM district is located in central Utah and is comprised mainly of the San Rafael Swell and the Book Cliffs--home to Nine Mile Canyon and the popular Desolation and Grey Canyon stretch of the Green River. The San Rafael, a popular motorized recreation destination, has become a spaghetti network of tracks left by uncontrolled off-road vehicles. The extreme proliferation of trails is due to the BLM's long-time failure to designate	Please see general comment response #19

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			a system of ORV trails--a system (and map) that inform the public where ORV use is acceptable and where it is not.	
	Form Letter	OHV Route Identification	Price BLM manages Utah's San Rafael Swell, in which there are six Wilderness Study Areas (WSAs)--areas the BLM is mandated to manage as Wilderness. As reported by BLM staff, some off-road enthusiasts continually drive where they know they are not supposed to travel--even though a majority of our public lands are just a short distance from roads. For example, in the Moab Field Office, 77% of public lands are within half a mile from a road. The recently obtained reports cite many cases of vandalism and illegal use. Near Hidden Splendor mine, there is an old route that goes down into lower muddy creek. It used to be blockaded by a boulder, but ORVers BLEW UP the boulder to get vehicles down into the canyon. When BLM built a buck and rail fence to keep off-road vehicles out of the riparian area, they came back later to find that someone had hurled the fence over the side of the cliff. In another instance, one barricade by the by the San Rafael River was demolished, the other portion was moved so vehicles could get around it, and the sign next to the barricade had been shot six times. These instances are just the tip of the iceberg and are recounted in BLM reports time and time again on different trips, different days and on a variety of routes. Hearing this, it is surprising that BLM generally only employs a single law enforcement officer for approximately every million acres of land. Knowing this, it is no surprise that responsible ORV users have no idea where to ride. BLM needs to remedy the problem. They need to designate a system of trails that they can enforce and eliminate off-trail cross-country travel all together. We live in a very delicate desert and it cannot sustain current levels of use. BLM needs to cut back illegal use by holding vandalizers and lawbreakers accountable for their actions. And, lastly, BLM needs to dedicate more funding toward law enforcement out in the backcountry, on-the-ground, and protecting wilderness areas, riparian zones, essential game habitat, and primitive recreation areas.	Please see general comment responses #15 and #19
	Form Letter	OHV Route Identification	(2.7.8) Provide ATV access to handicapped individuals ON BLM lands and roads and trails by permit to those individuals.	Please see general comment response #80
	Form Letter	OHV Route Identification	OHV use should be limited to existing roads only and should be limited to areas away from popular hiking, mtn. biking, and horseback riding areas. OHV users should be required to purchase a use pass to mitigate problems of rule breakers.	Please see general comment response #19
	Form Letter	OHV Route Identification	We are against seeing any further road closures in the San Rafael Swell Area. I am physically incapable of hiking in any of the WSA's and I don't wish to be further kicked out of the lands which I love. I would like for physically impaired persons to regain access to Wash Woman road on the Eastern Reef. It is unfair that with over 70 miles of reef, there is not one single road available to get to the views at the top of the reef. There is no reason to close any more roads. Travel has been severely limited already and the BLM has closed a significant amount of redundant roads.	Please see general comment responses #19 and #80
	Form Letter	OHV Route Identification	This document is slanted to the extreme with regard to the wilderness associations. The document has been developed in such a way that it is vague enough to sound conciliatory but the final outcome is that environmental	Please see general comment responses #19 and #123

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			concerns override the multiple land use options. To utilize this document to expand the "Wilderness" area(s) by vague and legalistic terminology is reprehensible. The plan to close roads that are currently being utilized is ridiculous. The roads have been in place for 50+ years, and to close them for no other reason than someone doesn't want them there is wrong. The road inventory is flawed and should not be included in the document. The entire document is flawed due to the vague verbiage.	
	Form Letter	OHV Route Identification	I'm a Utah resident with some concerns about the many changes being considered for the new Resource Management Plan in the Price area. While I understand that there must be certain restrictions on OHV use, I do not support the notion of closing existing routes, with the exception of small, illegally created dead-end trail spurs. I have a family with small children that are too young to participate in hiking. The only chance we have to enjoy the outdoors as a family is with our SUV. When trails are closed to motorized use, they are useless to my family. I am aware that many wilderness advocate groups would like nothing better than to close off most public lands to OHV use. Frankly, I'd like to get hikers and horseback riders off the trail and out of my way, but that would be a very self serving and unfair. The reverse is also true. The public lands should be accessible to the public as a whole - not just to those who are in good physical condition and who enjoy hiking. If use fees are required, those fees should be used solely for the maintenance and improvement of the area for which they are collected. They should certainly not be deposited into a general budget fund. This way, those who use the land are the same ones who maintain it.	Please see general comment responses #80 and #147
	Form Letter	OHV Route Identification	In addition, I would like to urge the BLM to abstain from designating any "open areas" for ORV use without limitation and to abstain from designating ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness study areas.	Please see general comment responses #12 and #36
	Form Letter	OHV Route Identification	I would appreciate it if the BLM would fully analyze each proposed motorized route to ensure that environmental and social impacts are minimized. Please do not designate any "open areas" where ORV is allowed without limitation, nor to designate ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness study areas like Sid Mountain.	Please see general comment responses #12 and #36
	Form Letter	OHV Route Identification	It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation.	See general comment responses #12, #19 and #36
	Form Letter	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. BLM maps must be updated to accurately portray the OHV designations outlined in each alternative. BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. Sadly, most of the “green lines” on Map 2-56 are actually closed to unlicensed OHV use. Ask the BLM how many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use?	See general comment responses #20 and #78
	Form Letter	OHV Route Identification	The decision to designate specific trails for off-road vehicle (ORV) use is laudable. But the draft revision leaves open far too many and closes far too few. Motorized trails would remain on more than 2 million acres. Such intensive vehicular use interferes with primitive and quiet recreational activities (such as hiking and horseback riding). And motorized use damages riparian areas and other wildlife habitat. Please protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse	Please see general comment response #19

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			Mesa, and Desolation Canyon.	
	Form Letter	OHV Route Identification	The BLM, in all its wisdom, is planning the closure of many roads in the Carbon/Emery area. Roads which have been used for years by thousands of people. These roads represent our lifestyles, recreation, legacy, and heritage and are now being threatened by an all knowing, all seeing department of our government, which answers to no one. As a youth I remember singing a song, part of the lyrics stated that 'This land is your land, this land is my land'. Our rights as American citizens are slowly being taken away, the little things in life which bring us joy, as well as tourism to our area are being threatened. This needs to be stopped and the BLM needs to account and answer to the public.	The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. Also see general comment response #19.
	Form Letter	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use. By closing more and more routes to our use everyone is being put into smaller areas which is much more damaging to the land.	Some of the routes mentioned in the text of the Draft RMP/EIS were inadvertently left off of the preferred alternative map. With the exception of Alternative E, all of the alternatives analyzed in detail would not change the San Rafael Route Designation Plan. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. Table 2-15 of the Proposed RMP/Final EIS indicates that under the Proposed RMP the Summerville/Chimney Rock Trail System/Arapeen Trails System would be open. See general comment responses #19, #20 and #31.
	Form Letter	OHV Route Identification	My husband and I enjoy 4 wheeling and sightseeing in your area. We are senior citizens that can no longer hike so the only way we can see the area is by 4 wheel drive. We think it is very unfair that many roads and trails are being closed to our use, and only those that can hike can enjoy the back country.	Please see general comment response #80
	Form Letter	OHV Use	BLM in Utah plans to designate almost every reclaimed mining route, two-track and wide cow path as open to motor vehicles. This would be a very unsound policy to adopt.	See general comment response #19
	Form Letter	Process and Procedure	Policies are created in a different manner. If the NEPA process has been followed, then please refer us to the ANPR and public release for our comment. The DEIS portion of an RMP is not what Congress intended to be the platform for creation of new policies. Is it the BLM's idea to attempt to have a policy approved in this plan, and then to apply it to all of the other RMP's across the west? The criteria presumes to allow conservation use of grazing allotments in apparent disregard of the 1999 10th Circuit Court case under PLC v. Babbitt. In which it was found that conservation use of grazing allotments is illegal under the TGA.	See general comment responses #82 and #83
	Form Letter	Process and Procedures	It is my hope the BLM will find the right fit in the final RMP where multiple use includes energy development and traditional multiple uses. While everyone should have a say in how public lands are managed, careful consideration should be placed on policies that would devastate economies in the name of recreation for a select few.	Please see general comment response #56
	Form Letter	Process and	Now is the time to protect and preserve wildlands in Utah by not designating off-road vehicle tracks or allowing oil	Please see general comment responses #12, #36

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		Procedures	and gas seismic testing and drilling in America's Redrock Wilderness.	and #101
	Form Letter	Process and Procedures	Lack of adequate range of Alternatives: Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the “no action” alternative) contain very similar, highly restrictive management prescriptions. Through the use of overlapping and confusing management “layers” BLM will attempt to require the public to comply with similarly confusing layers of restrictions, permits and fees. Aside from a slight difference in group size limits and slight change in SRMA boundaries there are very few differences in the action alternatives. As an example of the similarities, we note that there is no alternative with group size limits that aren’t tied to the ROS class. No nexus between facts on the ground and management proposed. The DRMP/DEIS provides inadequate information on its proposed management. In many cases, such as the highly restrictive group size limits proposed in all of the action Alternatives, the proposed management is not supported by any reasonable rationale. There legal requirement as well as a critical need to clearly articulate the desired future condition, frame the issues, describe resources and impacts to be addressed and disclose the criteria for the development of the Alternatives. The DRMP/DEIS does none of this. The public should be able to clearly understand why specific management has been proposed in accordance with each alternative based upon desired future conditions and changes in existing resource conditions. The document fails to provide the requisite analysis necessary to justify resource management proposals and in particular, restrictive management proposals that differ from current management. Inappropriately restricts future management options. The DRMP/DEIS makes so many site specific decisions regarding recreation management that future management options are precluded.	Please see general comment responses #2, #37, #81
	Form Letter	Process and Procedures	CONCLUSION: It is our strong desire to provide comments and suggestions regarding the range of alternatives and what part of which alternative best protects natural resources while providing a quality recreational experience. As we have outlined in our comments, the DRMP/DEIS doesn’t provide the public or decision makers sufficient information, rationale and analysis to comment on proposed management, asses a variety of methods to address issues or compare and contrast a wide range of alternatives. BRC/USA-ALL strongly urge BLM to revise and supplement the DRMP/DEIS and incorporate our suggestions in these comments. We strongly urge BLM to seek additional input from the recreating public regarding formation of different and better management alternatives. We also hope BLM will clearly articulate the need for the proposed management.	BLM has provided a reasonable range of alternatives. Each alternative, except for the no-action alternative, represents an alternative means of satisfying the identified purpose and need, and of resolving issues. Identification of the range of alternatives began early in the RMP process starting with the public scoping period (January 2002) and was further developed throughout the process in coordination with our cooperating agencies and during the public comment period.
	Form Letter	Process and Procedures	The BLM should also move promptly to protect the areas where ORV damage is too great, including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country	The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing

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			ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	opportunities for OHV use and mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of OHV use and open route designations.
	Form Letter	Process and Procedures	I am writing to protest the Price Resource Management Plan draft alternatives. Please protect America's Redrock Wilderness! This beautiful landscape is a treasure that belongs to all American people, and it would be a tragedy if it were destroyed.	Please see general comment responses #12, #36 and #111
	Form Letter	Process and Procedures	The BLM failed to consider an alternative that would protect the Redrock wilderness' wild lands, wildlife and recreational opportunities. It failed to even consider whether any of the remote and untrammeled landscapes deserved permanent protection from oil and gas development. The Castle Country Heritage Plan is a reasonable, well-balanced plan, and it should be adopted by the BLM.	Please see general comment response #12, #35, and #36
	Form Letter	Process and Procedures	The public lands of the Price Resource Area are a special part f this country's national heritage and should be protected for the use and enjoyment of all Americans. Unfortunately, the recent draft revision to the Price Resource Management Plan (RMP) fails to ensure such protection. Your draft fails to strike a balance between preservation, recreation, and energy development. Instead, it favors a few special interests at the expense of the American public. It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions.	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
	Form Letter	Process and Procedures	I am writing today to submit my comments regarding the Price Resource Management Plan draft alternatives and to endorse the Castle County Heritage Plan. I believe that this plan offers a balanced approach that not only protects lands include in America's Redrock Wilderness Act from oil and gas development and from ATVs, but more importantly includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meets these vital objectives.	Please see general comment response #35
	Form Letter	Process and Procedures	As an alternative, I endorse the Castle Country Heritage Plan. The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives. You can find more information about the Castle Country Heritage Plan at http://www.suwa.org/page/php?page_id=139.	Please see general comment response #35
	Form Letter	Process and Procedures	The public lands of the Price Resource Area are a special part of this country's national heritage and should be protected for the use and enjoyment of all Americans. Unfortunately, the recent draft revision to the Price Resource Management Plan (RMP) fails to ensure such protection. Your draft fails to strike a balance between preservation, recreation, and energy development. Instead, it favors a few special interests at the expense of the American public.	FLPMA requires that the RMP be a multiple use plan. 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

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				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. Also see general comment response #1.
	Form Letter	Process and Procedures	In addition, I write to ask you to support the balanced alternative, the Castle Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests without precluding any. Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands.	Please see general comment response #35
	Form Letter	Process and Procedures	In the revised Price BLM Management Plan, the BLM should ensure that all lands in the Utah Wilderness Coalition's Citizens' Wilderness Proposal are set aside, and never allowed to be drilled...or even open to speculative energy leasing. These lands are critical both for scenic/wilderness qualities, and also the important habitat they offer for plants and animals. Preserving these special places now proposed for wilderness from oil and gas development will ensure that these natural wonders, critical wildlife habitat, riparian corridors, and ecologically sensitive areas will not be squandered for short-term, speculative gain. As such, I support the "Castle Country Citizens' Alternative" for the Price Resource Area DEIS. The BLM should either adopt this alternative outright, or incorporate major provisions of it into the preferred management alternative for the Resource Area. At the very least, areas included in the UWC wilderness proposal - such as the majestic and spectacular Desolation Canyon Unit - should be OFF limits to all new energy leasing, exploration, drilling and development.	Please see general comment responses #35 and #36
	Form Letter	Process and Procedures	Please adopt the Castle Country Heritage Plan. Please stop the oil and gas drilling within the Redrock Wilderness Act areas. Please stop the degradation of our public lands and control ORV abuses. No more "open areas" and stop designation ORV trails in the ARWA areas. Protecting our public land's should be hands down the main priority of the BLM. Unfortunately that has not been the case. The majority of the public wants the BLM to at all costs protect the environment. I've watched the debauchery going on for to long now and changes need to be made. The BLM is in no position to tolerate the destruction of public lands. It's time to act before anymore is destroyed.	Please see general comment responses #35 and #36
	Form Letter	Process and Procedures	Since public input is a critical component of BLM's lawful planning process, I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative.	The Draft RMP/EIS and Proposed RMP/Final EIS do contain a current map of existing roads in the current inventory (Draft RMP/EIS Map 2-54, and

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				Proposed RMP/Final EIS Map 2-74). The inventory includes roads submitted to the BLM by Carbon and Emery County, routes extracted from AGRC maps, routes extracted by remote sensing, and routes submitted by various OHV, motorcycle and off road groups (all without regard to ownership). Roads and routes in the San Rafael Travel Plan area were not part of the original map since that data already exists in the San Rafael Motorized Route Designation Plan. Also see general comment responses #20 and #31.
	Form Letter	Process and Procedures	I propose that the current plan be totally scrapped and start over. The plan should be done in a format that the public can comment on in specific terms. Public meetings should be held on each section of land (no larger than 10,000 acres). If the sensitivities are valid and of concern, the public as a whole will back it. If not, then the BLM will have local public support to keep out-of-area environmentalists at bay.	There is no need for further supplementation of the Draft RMP/EIS for the following reasons: The alternatives analyzed in detail were refined; the Proposed Plan/Final EIS incorporates changes as necessary based on the commentor's concerns; BLM provided informational meetings on the Draft RMP/EIS for a variety of topics in August, 2004, the Salt Lake meeting was held on August 31, 2004; BLM documented all public outreach activities, including these informational meetings and provided a multi-faceted outreach strategy in order to involve the public in all phases of this collaborative planning effort, including but not limited to Federal Register publications, planning bulletins, open houses for scoping and other informational purpose, news releases, website notification, television promotion, as well as informational meetings on the DRMP/DEIS and supplements to the Draft RMP/EIS regarding ACECs and non-WSA lands with wilderness characteristics were prepared with public involvement and comment. Chapter 5 of the Proposed RMP/Final EIS summarizes this information. See general comment response #143
	Form Letter	Process and Procedures	The BLM should also move promptly to protect the areas where ORV damage is too great, including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment responses #1 and #36

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	Form Letter	Process and Procedures	The Bush administration has promised to protect wilderness characteristics of public lands. Few public lands are more deserving of such protection than the wilderness quality lands within the Price area. Your proposed plan is totally unbalanced in refusing to provide any meaningful protection for these magnificent and irreplaceable wildlands. On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including wilderness.	Please see general comment responses #1 and #36
	Form Letter	Recreation	Public lands should be open for multiple uses including free grazing and recreation such as camping, fishing and ATV use in designated areas.	Please see general comment response #1
	Form Letter	Recreation	Social Conflict: Goal: Provide for a wide range of accessible and highly desirable recreation experiences and opportunities for visitors and community residents while protecting other resource values. Objectives: • Educate the non-motorized visitors about when and where they may encounter vehicle traffic as well as informing them of areas where they may avoid such encounters. • Educate vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encourage slower speeds and a more courteous ethic in these areas. • Re routing either use so as to avoid sections of roads or trails that are extremely poplar with both groups. For example, a hiking trail can be constructed to avoid a section of popular OHV routes. Or an equestrian trail may be constructed to avoid a section of popular mountain bike route, etc. • Dispersing all forms of recreational use so as to minimize conflict and create a more desirable experience. Safety: Goal: Provide for a safe environment for OHV use, weighing expectations for risk and challenge, through identification of appropriate designated routes. Objectives: • Educating the vehicle-assisted visitor of where the road or trail might be shared with non-motorized visitors, and encouraging slower speeds and a more courteous ethic in these areas. • Work with state and county on effective signing on county roads that allow unlicensed vehicles • Utilize standardized trail signing and marking in coordination with the Utah NRCC, including the standardized trail difficulty rating system for all OHV trails.	See general comment responses #15, #19, #78 and #79. Chapter 2 of the DEIS states as an objective development of a transportation plan within five years of adoption of the RMP; at that time the PFO can choose to incorporate some of the commentor's suggestions on a site-specific basis. The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that allows opportunities for OHV use and recreation and for the BLM to protect the resources and resource uses is considered. The management actions proposed under the Alternatives will offer management flexibility to ensure resources are protected while allowing for acceptable OHV use and recreation. Additionally, as activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.
	Form Letter	Recreation	BLM is proposing severe group size limits. Group size limits puts clubs, large families and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment response #81
	Form Letter	Recreation	One of the proposals in the plan includes the requirement of permits for group activities as small as 10 vehicles.	Please see general comment response #81

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			All trucks, cars, ATV's, and motorcycles would be counted and perhaps even campers, trailers, and bicycles would be included. You would need to apply for a permit 6 months in advance, pay a fee, supply a complete detailed plan of all activities, and perhaps even be required to purchase liability insurance.	
	Form Letter	Recreation	The permit process proposed is difficult to understand and is very counterproductive to clean organized youth activities and therefore detrimental to our area as well. It is imperative that the BLM not implement any plan until it is clarified to the public and written in a format that the public can easily comment on. A permit for non-commercial use should not be required, especially the unreasonable one proposed. The restrictions behind this permit make it very difficult for groups to enjoy the abundance of recreational areas available to them. Because groups will have to register with the BLM 180 days in advance, have group insurance, submit an operation plan, and pay for the permit, many organizations may choose to disband... Groups are not allowed to organize any event involving over ten vehicles. This includes club websites, newsletters, flyers, phone calls, radio announcements, or posters. These regulations create an expense and inconvenience that will discourage most family, friend and club groups from these types of wholesome activities...	See general comment response #81. The text of the Proposed RMP with respect to the requirement for organized group SRPs has been changed. All organized groups of more than 15/25/40 people within a WSA/SRMA/ERMA (respectively) would be required to contact the BLM. It is anticipated that most family gatherings could be accommodated without an SRP. Contact by an organized group and BLM's determination that a permit is not required would be documented in a Letter of Agreement. Criteria the BLM will use to determine if such groups need an SRP provided in Appendix J. This plan does not reduce dispersed camping in the Price Field Office, and would be allowed throughout the Field Office except in recreation management zones. Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and designated sites. Dispersed and vehicle camping regulations and number of designated sites outside the identified recreation management zones within the San Rafael Swell SRMA will be determined at the time the San Rafael SRMA activity plan is completed. Some portions of the planning area are closed to OHV use while other sensitive areas are limited to existing or designated roads and trails. Currently only county and state roads are restricted to licensed vehicles. BLM system roads and any "designated" routes are not limited to licensed vehicles. Emery County is currently addressing which of their roads will be "open" to unlicensed vehicles. That process should be completed by the time the RMP is finalized or soon afterwards. Very few state roads will be designated for that use but a couple of routes are being considered. Carbon County has not addressed their roads yet. This issue is the responsibility of state and county agencies, not the BLM. When those agencies complete their review and the information becomes available, the BLM will incorporate the information

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				into the route designation maps.
	Form Letter	Recreation	At a minimum, 1/10th of the land should be left for open use, dispersed camping and group camping. That would mean that out of each 10,000 acres a small section of 1000 acres would be set aside for public use of OUR PUBLIC land.	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.
	Form Letter	Recreation	There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please fix this problem in the Final EIS. BLM’s group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized not profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM Stay with the proven vehicle group size limit of 50 vehicles.	Please see general comment response #81
	Form Letter	Recreation	The DRMP effects all of Carbon and Emery County BLM lands. Many or all non-oiled roads on BLM ground are subject to closure. This may impact your family activities, church or group activities and even your hunting, fishing, and camping activities. One of the proposals in the plan includes the requirement of permits for groups as small as 8 vehicles (includes trucks cars, campers, camp trailers, towing trailers, ATV's and perhaps even bicycles) to purchase a permit 6 months in advance with a list of all attendees and their proof of insurance and a complete detailed plan of all of your activities.	Please see general comment response #81
	Form Letter	Socioeconomics	I also believe our [local] economy would benefit greatly from oil and gas exploration provided this can be done with the least amount of impact to our lands. Developing our natural resources is critical to our economic grown and independence from foreign sources.	See general comment response #132. FLPMA requires that the RMP be a multiple use plan. The term “multiple use” as defined in FLPMA means “the management of the public lands and their various resource values so that they are used in the combination that will best meet the present and future needs of the American people.” This direction indicates that not all uses need to be accommodated in all areas. The DRMP/EIS includes a detailed evaluation of a range of alternatives to ensure a balanced approach is considered. This balanced approach will ensure protection of resource values and sensitive resources while allowing opportunities for mineral

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				exploration and production. The Proposed RMP is designed to offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
	Form Letter	Socioeconomics	I also hope the BLM will keep the economic needs of local communities in your decision making process. We are dependant on BLM lands to diversify our economy. The wages that pay the employees and the taxes that maintain our communities all come from public lands.	See general comment response #132 and #133.
	Form Letter	Socioeconomics	I am in favor of "maximizing mineral development in the areas with the greatest potential for development" because our economy is dependent on the quality jobs mining and oil/gas provide our residents.	The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach that will ensure protection of resource values while
	Form Letter	Socioeconomics	Lack of adequate socio-economic analysis: The DRMP/DEIS must include disclosure and analysis of income and employment for various economic sectors, community infrastructure, state and local revenues and expenditures, and land use patterns, including motorized recreational activities. The DRMP/DEIS fails to effectively address the full realm of positive economic benefits associated with current and future recreational uses. BLM has failed to incorporate economic impacts into the decision making process and alternative formation. Despite what BLM may claim, there is no alternative that maximizes economic benefits.	See general comment responses #2 ,#132 and #133. In developing its range of alternatives, the BLM has an alternative which emphasizes commodity production, but the BLM is not required to formulate an alternative which maximizes economic benefits, given the BLM's multiple-use, sustained yield mandate, as well as the various laws and policies which governs its actions.
	Form Letter	Socioeconomics	Please register my objection to the adoption of the preferred alternative in the proposed Price District RMP without an adequate study of the socioeconomic impacts on our area. I hope a new alternative can be found based on a true economic review. I support the BLM developing a new version of alternative D with an increased review of the positive benefits of oil and gas and coal development.	See general comment responses #132 and #133.
	Form Letter	Socioeconomics	NO CLOSURES can take place until each area is clearly designated, with local public comment, as to the proper usage... the economy will also be damaged by this regulation. Some may believe the regulation will increase revenue for the BLM as groups purchase the permits or pay fines for violating them; however, many people will choose not to assemble rather than pay for the permits. The Utah Bureau of Statistics reported that 2593 OHV's and 2796 trailers were registered in Carbon County during the 2003 year, and that there were 1791 OHV's and 2135 trailers registered in Emery County that same year. Gas tax, that goes to roads, has a $42.9 tax on each gallon sold. The loss of gas tax along could result in over a BILLION $$$$ lost to the state each year. With the new restrictions, the people who own these vehicles will be less likely to use them. This will lead to fewer tax dollars and jobs. The revenue from ATV and 4x4 purchases in vehicles, gear, parts and gas is a boon to the economy that we cannot afford to lose. However, this money will decrease if the current DRMP is implemented. A COMPLETE ECONOMIC IMPACT ASSESSMENT worked up with county officials must be worked up in this plan. If the economic impact is excessive in this time of poor economy, then a government subsidized organization cannot close the ground to ensure their jobs to detriment of the general population. That should be clear to the BLM officials as without tax revenue from a strong economy their jobs will become insecure as well. A local vote on the proposal should be required.	See general comment responses #132 and #133.
	Form Letter	Special Status Species	Goals: Are appropriate, provided that Actions Common to all Alternatives are added to the EIS and final record. Maintain, protect, and enhance populations and habitats of BLM Sensitive plant and animal species to prevent	Inappropriately managed grazing can cause the effects described in the comment. Other uses can also contribute to these problems. Within its

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			the listing of these species under the Endangered Species Act. Add: Provided that designations or reintroductions do not grow beyond boundaries and scope and result in detrimental affects on the area economy, life styles, culture and heritage.	resource capabilities, BLM, in cooperation with users and the public, manages grazing and other uses in a manner that recognizes and addresses the potential for these effects so that, ideally, they are avoided. Under Subpart 4180 of the grazing regulations, BLM must manage grazing, which includes rest from grazing where appropriate, in a manner that achieves or makes progress towards achieving, standards for rangeland health. These standards have been developed on a regional basis and address watershed function, nutrient cycling and energy flow, water quality, habitat for endangered, threatened, proposed, candidate or other special status species.
	Form Letter	Transportation and Access	(2.10.1) The following air strips should be recognized and maintained for public use. Peters point--Mexican mountain--Cedar Mountain--Hidden Splendor horseshoe canyon--Stone Cabin Gas field--Cliff dwellers Flat--Sweetwater Reef-- Temple Wash. I support alternative I. The airports that are mentioned are low impact air[ports and should be considered in your RMP PLAN.	Please see general comment response #21
	Form Letter	Transportation and Access	The road closers is a bad thing, just because the county does not grade a road (lack of funds to do them all) is no reason to close it.	Please see general comment response #10
	Form Letter	Transportation and Access	Leave public land public. No fees, No permits need to be added, NO more restriction.	The use of public land is subject to the laws that regulate its management. Those laws are the product of the national legislature and to change them is outside the scope of the RMP.
	Form Letter	Wild and Scenic Rivers	We are strongly against the preferred alternate 'D' concerning the limited motorized use in Desolation/Gray Canyons. We have been serving the public in the area for over three decades and find: 1.The ban on the use of motors when the Green River is over 5000 cfs would hinder our operations for large tour groups, restrict the use of our inflatable kayak specialty and restrict our ability to serve special population groups. 2.Current motor use and type of meets EPA regulations. 3.The limit of 4 stroke, fuel injected alternatives coming on the market that will be environmentally friendly. Electric motors have been used by the BLM in Westwater Canyon and should be considered as well for the option of use. 4.The limit of 90 motor trips a year leaves too many questions unanswered. Who will get these special permits? If we have an extreme low water year will exceptions be made so we can do our three, four and five day trips? This restriction limits the options of maintaining minimum use requirements which in turn jeopardize our company. We prefer the 'no action alternative' concerning motorized use in Desolation and Grey Canyons.	Please see general comment response #34
	Form Letter	Wild and Scenic Rivers	I am an avid river runner, but have not yet run Desolation canyon. I look forward to running it in the near future. However, I will be much less interested in booking such a trip if there shall be drilling rigs and/or oil & gas wells visible from the river corridor.	The Proposed Plan would afford protection of the Green River corridor, especially through Desolation Canyon, by the continued management of the Desolation Canyon National Historic Landmark, the WSA, the SRMA, and proposed management for VRM class I, limitations for mineral development, and management related to the determination of

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				the Green River's suitability for designation under the Wild and Scenic Rivers Act.
	Form Letter	Wild Horses and Burros	(2.2.9) Wild horses and burros have met all objectives and exceeded objectives in many cases. The BLM needs to take affirmative action to maintain an accurate level of animals. Not exceed objectives	Please see general comment response #95
	Form Letter	Wild Horses and Burros	(2.7.9) Don't allow additional wild horses or burros into existing areas for diversity of genes if that area is over the population objective.	Please see general comment response #95
	Form Letter	Wild Horses and Burros	Actions Common to All Alternatives: Appropriate with the added language: Allow introductions of wild horses and burros from other herd areas to maintain genetic viability, as long as the horses being introduced have characteristics similar to the horses in the HMA to which they are being introduced. Existing livestock preference use must be recognized and allowed consistent with the TGA. Horse Management Plans must include provisions for periodic gathering of all horses in the unit to limit populations to planned levels, to remove trespass horses, and to test for equine diseases as prescribed by the Utah State veterinarian, and adopted County plans. Wild Horses assigned to herd units must be identified in such a way as to insure that feral or fugitive horses are not assimilated into wild horse herds on public lands. Remove natural and legal barriers, which prohibit the construction and maintenance of watering facilities, springs, seeps or ponds, which benefit livestock, or other wildlife. Amend as needed to manage according to latest Congressional decisions	The AUMs for wild horses and burros were set aside in previous plans; however the plans never specifically allocated them for wild horses and burros. The final RMP will make the allocation. Future changes in allocation based on monitoring data will comply with Code of Federal Regulations Title 43 subpart 4710.5(a): "If necessary to provide habitat for wild horses or burros, to implement herd management actions or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock."
	Form Letter	Wild Horses and Burros	Forage Allocation; Alternative D: Appropriate, with added language: 2,700 AUM's for wild horses and 420 AUM's for burrows would not occur at the expense of domestic livestock grazing. If this is what is happening and the DEIS is not revealing it, then we are registering an objection, as no AUM's previously assigned and designated for domestic grazing may be shifted away from domestic livestock to other uses within the grazing districts.	See general comment response #96.The AUMs for wild horses and burros were set aside in previous plans; however the plans never specifically allocated them for wild horses and burros. The Final RMP will make the allocation. Future changes in allocation based on monitoring data will comply with Code of Federal Regulations Title 43 subpart 4710.5(a): "If necessary to provide habitat for wild horses or burros, to implement herd management actions or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock."
	Form Letter	Wild Horses and Burros	In addition, I write to ask you to support the balanced alternative, the Castle Country Heritage Proposal, that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests without precluding any.	Please see general comment responses #35 and #36

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	Form Letter	Wilderness	A bipartisan bill in Congress has proposed 1.5 million acres in the Price area for wilderness status. We hope you will respect that by protecting those areas until Congress has acted.	Please see general comment response #36
	Form Letter	Wilderness	The draft plan lacks any concept of balance. It protects no wilderness, but it opens a million acres of proposed wilderness to oil and gas drilling and leaves off-road vehicles free to run wherever any old dirt track exists. We urge you to protect all the proposed wilderness areas from oil and gas leasing, so Congress will be able to decide the wilderness question.	Please see general comment response #36
	Form Letter	Wilderness	The Castle County Heritage Plan strikes a better balance by protecting special places like Nine Mile Canyon, Upper Desolation Canyon (below Sand Wash), the Price River corridor, the San Rafael Reef, the San Rafael River and Labyrinth Canyon from oil and gas leasing and industrialized development. It would further safeguard other wilderness quality lands such as Muddy Creek, Mexican Mountain, San Rafael Knob, and Sids Mountain, all within the San Rafael Swell, from off-road vehicle abuse, while still providing around 2,900 miles of routes for motorized recreation. These areas are all included within America's Redrock Wilderness Act and contain stunning scenery, valuable wildlife habitat, and rare archaeological sites that reveal a record of early human presence dating back hundreds of years.	Please see general comment responses #35 and #36
	Form Letter	Wilderness	It is wrong that the citizens are being denied access to our back country all for some greedy hiker from New York City that wants to have a wilderness experience. This land belongs to all Americans, not only those that are fit and physically capable of hiking 5-20 miles per day. The current WSA areas should be hemmed in and not expanded any further. The WSA areas are more than adequate to provide the wilderness experience.	Please see general comment responses #1, #80 and #114
	Form Letter	Wilderness	BLM should refrain from offering oil and gas leases in the areas proposed for wilderness designation in America's Red Rock Wilderness Act.	Please see general comment responses #36 and#101
	Form Letter	Wilderness	[As a part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict. I also urge you to protect these lands from further damage from off-road vehicle activity.	Please see general comment responses #12, #36 and #101
	Form Letter	Wilderness	Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development. I also urge you to protect these lands from further damage from off-road vehicle activity. On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including wilderness.	Please see general comment responses #12, #36 and #101
	Form Letter	Wilderness	I urge you not to offer citizen proposed wilderness lands to oil companies for development. Preserving these special places, now proposed for wilderness, from oil and gas development will ensure that these natural wonders, critical plant and animal habitat, riparian corridors, and ecologically sensitive areas will not be squandered for short-term, speculative gain.	Please see general comment responses #6, and #101
	Form Letter	Wilderness	More must be done to control the threat posed by off-road vehicles. This mode of travel, with its noise levels, its polluting emissions, and its churning tires, cannot coincide with preservation of the land’s natural state. Motorized vehicles themselves are not natural and, therefore, should find no home in the Redrock Wilderness. Please	Please see general comment responses #12 and #36

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			designate off-road vehicle trails outside of citizen proposed wilderness areas.	
	Form Letter	Wilderness	In addition, I write to ask you to support the balanced alternative, the Castle Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests without precluding any.	Please see general comment responses #35 and #36
	Form Letter	Wilderness	I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. Allowing companies on this land causes numerous unnecessary environmental problems.	Please see general comment response #101
	Form Letter	Wilderness	The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #35 and #36
	Form Letter	Wilderness	I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. I have recently visited this area and the area is truly a national treasure that we must preserve for future generations. Allowing companies to lease, explore for oil and gas, and ultimately develop these lands, ruins the stunning scenery of this unique area, degrades water quality, causes harmful soil erosion, endangers wildlife habitat, and destroys rare but essential riparian areas that should be protected. We must learn, as a nation, to think farther ahead than just a few months down the road.	Please see general comment response #101
	Form Letter	Wilderness	Having personally and sadly witnessed some of the damage caused by ORVs, as well as the ugly invasion of oil and gas drilling, in places I previously enjoyed for their wild and/or pristine character, I urge the BLM to protect places of special beauty from motorized use and oil and gas drilling. I strongly support the Castle County Heritage Plan—the citizen's alternative which offers a solid balance between natural preservation and continued development and motorized recreation. Especially, there should be no designated routes for motorized use within Wilderness Study Areas and other lands within America's Redrock Wilderness Act.	Please see general comment responses #12, #35, #36 and #101
	Form Letter	Wilderness	I urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrial developments. The oil and gas supplies possibly gained from these activities are only small and don't measure up to the present and future value of these irreplaceable wilderness lands and the crucial habitat they offer for wildlife like deer, elk, bear, and cougar. Other special places I want to see protected are: Chimney Rock, with its riparian zones and wildlife habitat; Behind the Reef; The Price River proposed area, and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment responses #36 and #101
	Form Letter	Wilderness	Gray Canyon Wildland Management Area (WMA) pages 2-41, 42: The no Action Alternative, with added language should be the Preferred Alternative: The Gray Canyon WMA would continue to be managed for wildlife, watershed, and recreation, provided: Off-highway vehicle (OHV) use in Gray Canyon WMA is partially open and partially limited to designated routes, as is consistent with County transportation plans. (See Map 2-12.) Grazing is excluded, until such time as grazing removal has been shown to: a.. Disrupt the orderly use of the range, b.. Breach the Secretary's duty to adequately safeguard grazing privileges,	The comment is not consistent with the objectives of the Gray Canyon WMA. The area is proposed for special restricted use management that would not be protected as proposed in the comment. The laws referred to in the comment protect the public lands from degraded conditions. All of these laws contain fundamental protection and conservation under the principles of multiple use and sustained productivity. The laws also have provisions for

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			c.. disrupt or impair the fiduciary responsibilities of States under the provisions of their Enabling Act d.. Be contrary to the protection, administration, regulation and improvement of public lands within grazing districts, e.. Hamper the government's responsibility to account for grazing receipts, or f.. Impede range improvements as foreseen by the TGA and FLPMA, g.. Have violated 1712(e)(2, of FLPMA, the appropriate regulations in CFR 4100. TGA or PRIA.	changing management practices that result in deterioration or are superseded by other laws or orders. Each requires periodic collection of data or evaluation to determine the effectiveness of current management and to make any adjustments as needed or mandated.
	Form Letter	Wilderness	I understand that the BLM is now determining which areas in the Price Resource Area will be left open to oil and gas leasing, drilling, and development, and which areas will be protected. I also understand that the agency's preferred alternative will leave 98% of unprotected wilderness quality lands open to oil and gas development. Surprisingly, the majority of these wilderness quality lands have been recognized by the BLM as eligible for future wilderness designation.	Please see general comment responses #36 and #101
	Form Letter	Wilderness	It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing.	Please see general comment responses #36 and #101.
	Form Letter	Wilderness	Please protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon.	Please see general comment responses #36 and #101
	Form Letter	Wilderness	As a part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon you unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict. I also urge you to protect these lands further damage from off-road vehicle activity.	Please see general comment responses #12, #36 and #101
	Form Letter	Wildlife and Fish	Add: Wildlife numbers will remain at the allocated level until studies and analysis are completed to determine the ability of forage resources to support the increases and species population trends. No increases in wildlife numbers or the introduction of additional species may be made until the increase in forage or habitat has been provided for. The impacts to other wildlife species will be assessed prior to managing for increases or introduction. For example: It has been theorized that elk numbers throughout Utah are extreme, exceed historical populations, and are affecting the deer population. Reductions in forage allocation resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife as well as livestock according to CFR 4100 grazing regulations. Wildlife target levels and/or populations must not exceed the forage assigned to wildlife in the RMP forage allocations. Predator and wildlife numbers must be controlled to a level that protects livestock and other private property from loss or damage and to prevent decline in populations of other wildlife species. Through wildlife habitat mitigation banking, impacts of development can be mitigated in a more efficient and planned manner. When implemented, this system could provide much-needed habitat for wildlife and livestock alike, while providing for multiple use.	The relationship between livestock grazing and other uses of the public lands, and the capacity of the land to support wildlife, watershed function, and livestock, are questions of multiple use management, i.e., how public lands and their various resources “are utilized in the combination that will best meet the present and future needs of the American people.” 43 U.S.C. 1702(c) (definition of “multiple use”). Pursuant to section 202 of FLPMA (43 U.S.C. 1712), BLM prepares resource management plans (RMPs) to consider and balance the multiple uses that may be appropriate for tracts of public lands. Decisions determining or adjusting livestock stocking rates, or determining how to measure an allotment’s improvement in rangeland health, ordinarily require site-specific information that can most efficiently be obtained by developing an allotment management plan (AMP) or a grazing decision.
	Form Letter	Wildlife and Fish	Alternative B. Predator control action will be implemented by allotment area individually through proper revisions	See general comment response #47. The

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			to the MOU with APHIS to target species-specific needs for livestock grazing. Alternative D, with the following added language: Recognize and coordinate with valid existing rights and holders of grazing preferences, Big game winter range would be managed to maximize browse production, using class of livestock and season of use, browse production, using class of livestock and season of use consistent with CFR 4100 on lands within grazing districts the Utah Rangelands Standards and Guidelines .	suggested language is not necessary because regulations and laws applicable to all alternatives and actions require coordination.
	Form Letter	Wildlife and Fish	Grazing Management in Pronghorn Ranges: page 2-41: Alternative D, with the following added language: Recognize and coordinate with valid existing rights and holders of grazing preferences, current livestock-grazing prescriptions would continue and, where opportunities exist, would be adjusted to enhance forbs production on pronghorn antelope ranges, consistent with CFR 4100 on lands within grazing districts.	Please see general comment response #103
John	Fotheringham	OHV Route Identification	I am writing to address the closing of the "San Rafael" area to OHV usage. Please allow us the right to continue to responsibly enjoy this area.	Please see general comment response #20
Gene	Foushee	Transportation and Access	Thanks to the persistence of the Utah Back Country Pilots Association and the sometimes-attentive ears of the BLM, we still have a few of the old strips to use. We do appreciate that and encourage the BLM (and Forest Service) to permit and help us keep the valuable resource of these remote airstrips.	Please see general comment response #21
Stephanie	Fowler	Minerals and Energy Resources	I know that progress is necessary, but can we please use areas that are already on permit first before taking up other space.	Please see general comment response #18
Mary	Francis	OHV Route Identification	Please order the BLM to move swiftly to protect greatly damaged areas from more Off Road Vehicle damage, including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment responses #15 and #19
Mary	Francis	Wilderness	As a part owner of Utah's public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres currently managed by the Bureau of Land Management's Price Field Office. The 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act are part of the grandeur of America. Rather than sacrifice these irreplacable wildlands to oil and gas development, I urge you to protect them from the irreversible harm that oil and gas drilling would surely inflict.	Please see general comment response #111
Mary	Francis	Wilderness	The BLM itself has confirmed that more than a million acres of lands in this area qualify for federal wilderness protection. The draft plan for the Redrock Wilderness would open virtually all of these wildlands to oil and gas development, threatening such renowned treasures as the remote and wildlife-rich Book Cliffs as well as Desolation and Labyrinth canyons. In all, the plan would open some 98 percent of lands that should be preserved as wilderness (but have not yet been protected by Congress) to drill pads, roads, waste pits and more. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development. The Bush administration has promised to protect wilderness characteristics of public lands. Few public lands are more deserving of such protection than the wilderness-quality lands within the Price area. Your proposed plan is unbalanced and does not provide any meaningful protection for these spectacular and irreplaceable wildlands.	Please see general comment responses #12 and #111

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Garth	Frandsen	Minerals and Energy Resources	Thank you for the opportunity to comment on the Price Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS). I support the continued development of oil and natural gas in the planning area covered by the Draft RMP/EIS. However, the Preferred Alternative as written fails to lay out a basic foundation for future land use decisions by broadly imposing restrictive measures to limit industry's ability to access lands for environmentally responsible oil and gas leasing, exploration and development. Specifically, I request that the Preferred Alternative be adjusted to address the following : BLM needs to redraft the Reasonable Foreseeable Development to comply with BLM policy and realistically address the development potential in the planning area.	Please see general comment response #51
Garth	Frandsen	Socioeconomics	BLM needs to fully analyze the socioeconomic impact of the restrictions placed on oil and natural gas development within the planning area.	Please see general comment response #132
Ed	Friedman	Minerals and Energy Resources	All lands proposed for wilderness in America's Redrock Wilderness Act should be off-limits to mineral leasing and mining. Those areas should be kept intact, with their wildlife values unimpaired, until Congress can make a decision on the wilderness proposals.	Please see general comment responses #36 and #101
Ed	Friedman	OHV Route Identification	We urge BLM to place the proposed wilderness areas in the Redrock Wilderness Act off-limits to motor vehicles. We understand the Price Field Office has 2500 miles of vehicle routes available for ORV activities without ever entering the proposed wilderness. The damage from ORVs within those crucial areas has been allowed for too long, and it is time to curtail it.	Please see general comment responses #19 and #36
Peter	Friedman	OHV Route Identification	Please act to keep the areas and trails around Moab, Utah OPEN to OHV motorcycles. In September, I completed a cross country trip with my wife and I specifically included Moab as a destination because of its unique opportunity to ride motorcycles. We stayed three nights in town and paid for a tour guide (Elite Motorcycle Tours) and rental motorcycle which added a significant inflow to the local economy. I can't imagine the loss to the local economy if OHV's are banned or restricted from this area.	Section 4.6 of the Proposed RMP/Final EIS evaluates the socioeconomic impacts of allowing or restricting use of BLM lands and resources. This includes evaluation of socioeconomic impacts from changes in recreational activities and opportunities for private enterprises to use BLM lands and resources for commercial uses such as guide services. See general comment response 132.
Jack and Peggy	Friesen	Recreation	We enjoy hiking in the red rock country but as senior citizens we are limited to distance. Closing a number of roads would place limits on our hiking. In regard to DRMP/DEIS it is both ironic and ambiguous that the BLM would close much of this area to recreation while at the same time leasing the same land to oil, gas and coal companies for exploration. Companies whose road building habits cannot be defined as environmentally friendly.	Please see general comment responses #14 and #80
Darryl	Fuller	OHV Route Identification	I run an Outdoor Program at a college preparatory high school in Western Colorado. While I acknowledge the right of all recreationalists to be able to enjoy our public lands, I consistently seek out areas to explore where I will not be assaulted by noisy gasoline combustion engines. We spend a lot of time teaching our students about LNT ethics and practices, trying to inculcate in them a wilderness ethic so that they may grow up and fight for the preservation of wildland. Nothing is more counterproductive to our efforts than coming across an area of crypto-biotic crust that has been torn up with tracks. From my experience ATV's rarely stick to the established trail, even if only to turn around they have a significant impact on the land.	Please see general comment response #19
G.	Fullmer	OHV Route	I recently saw a map of the area being studied under this RMP. It shows a vast majority of the back country roads in the area being closed under this proposal. Is this map correct? How can I get a larger copy of it?	Please see general comment response #19

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		Identification	Please consider the impact such closures and restrictions will have on the local economy when tourism in the area is reduced.	
Bryant	Furness	OHV Route Identification	All of the popular OHV trail systems must remain open. I understand you are going to restrict group size. I oppose that. Your BLM maps must be updated to accurately detail the OHV designations outlined in each alternative. Do not close established routes.	Please see general comment response #19
Nick	Furness	OHV Route Identification	Please keep the Humbug and Chimney Rock Summerville trail system open. All of the popular OHV Trail Systems must remain open.	Please see general comment responses #20 and #31
Pat	Furness	OHV Route Identification	Your BLM maps must be accurately detailed to show the OHV designations outlined in each alternative. Please keep the chimney Rock Summerville and Humbug Trail Systems open.	Please see general comment responses #20 and #31
Ben	G.	OHV Route Identification	A 2-strike and your out rule would also work well. Such as if a person performs actions harmful to the environment like dumping antifreeze or riding on undesignated trails then they should be punished and their privileges for using the roads and trails taken away along with fines. Responsible OHV users have a culture that polices itself. Example is when a person is doing something that you know will just make those don't agree with our philosophy turn against us. Responsible users have a tendency to report the rule breakers to the proper authorities.	Please see general comment response #19
Ben	G.	Recreation	The current limits of 50 people per group are just fine if the proper planning is taken. Large numbers usually means that responsible people are involved mainly for safety reasons. If permits are required than make it enjoyable for those that come. Such ideas as portable toilets stationed periodically or places easy to find where one can register for safety reasons in case one becomes lost or injured. Making OHV users use marked roads is the easy part. The culture of organized riding groups has always been don't liter, respect the other users and always promote rider safety.	Please see general comment response #81
Ben	G.	Transportation and Access	If not for my motorbike I would not have seen half of this country we call the United States. As for possible restrictions on access to back country my concern is that the freedom of recreation does not become big business as it always seems to do. Anytime Americans find a new way to express their freedom there always seems to be group hell bent on turning it into big profit for no one else but themselves.	Please see general comment response #10
Natalie	Gabel	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Paul and Laura	Gajdos	Wilderness	We appreciate the time you are taking to read our letter to you and our concerns in protecting Utah's wilderness areas. We live in Alpine, Utah and our backyard is the Wasatch Mountain Range. We have tight restrictions on Motor Vehicle use so that we protect our trails and wildlife habitat and the beautiful mountains with all their natural beauty. We have visited and camped in many locations throughout Utah and have great concern over those individuals who would want to allow certain changes to hurt these pristine wildlife areas. Central Utah has so many areas protected now, but they are in danger of having revisions and changes to rein and destroy what we want left untouched. We hope and pray you can assist in protecting our wilderness areas for the generations to	Please see general comment response #109

First Name	Last Name	Category	Comment	Response
			come.	
Glory	Galbraith	Minerals and Energy Resources	I would hope that you would consider preventing oil and gas development that would absolutely destroy the delicate ecosystem. Please do not allow these large companies to come in and drive off the unique wildlife. Please protect citizen proposed wilderness areas.	Please see general comment response #101
Michael	Gannon	Minerals and Energy Resources	Please do your best to prevent the invasion. Keep the air clean and the sounds silence. Hopefully, we can also keep the area free of oil and gas exploration. It would truly be a shame to ruin the serenity of the area with all the construction and destruction that would be necessary for the short term gratification that the small amount of fuel there would provide.	Please see general comment response #18
Michael	Gannon	OHV Route Identification	I'm writing on behalf of the Price, UT unit of the Bureau of Land Management and hoping we can yet hold off on its "development". I've driven near that area on a couple occasions and have thoroughly enjoyed over 20 years of hiking and backpacking in the Western States. I'm hoping we can keep your area protected. In my opinion, the snowmobile use in Yellowstone years ago totally destroyed my wilderness experience when I was there, plus it fouled the air terribly. Why is this ORV use necessary in your pristine area? Please do your best to prevent the invasion. Keep the air clean and the sounds silence. Hopefully, we can also keep the area free of oil and gas exploration. It would truly be a shame to ruin the serenity of the area with all the construction and destruction that would be necessary for the short term gratification that the small amount of fuel there would provide.	Please see general comment response #19
David	Garbett	OHV Route Identification	I am particularly concerned with the level of off-road vehicle abuse in the San Rafael Swell. I have witnessed irresponsible riding and the accompanying destruction that follows such activity on many occasions. Near the Devil's Canyon area I unfortunately heard and observed two motorcycles on a cross-country tear through a proposed wilderness area. Just this summer I came upon vehicle tracks in the Crack Canyon WSA. I have witnessed off-road vehicle abuse in the San Rafael Reef area, the Muddy Creek area, the Sids Mountain area, and the Mexican Mountain area. The current draft RMP does not do enough to crack down on such abuse. The condition of the Swell will only continue to deteriorate unless the BLM takes more initiative in drafting a travel plan to be included in this RMP.	Please see general comment responses #15 and #19
David	Garbett	OHV Route Identification	The Castle Country Heritage Plan contains the best travel plan yet proposed for the region. Although it leaves open more routes than I would prefer to see remain open, I feel it is an acceptable and workable compromise.	Please see general comment responses #19 and #35
Dale	Gardner	Transportation and Access	There are several other airstrips that occur with the RMP area I believe these airstrips should remain open and available for use.	Please see general comment response #21
Lynn	Gargill	Wilderness	America's Redrock Wilderness Act. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development. The BLM should also move promptly to protect the areas where off road vehicles (ORV) damage is too great. Opening new areas like the trail to the top of the Book Cliffs, which you plan to propose, should be rejected.	Please see general comment response #111
Susie	Garretson	Minerals and Energy Resources	I also am concerned that you would open up these areas for Oil and Gas exploration, leasing and drilling. This most certainly will destroy the beauty of your beautiful country and cause irreparable damage to a country that has taken millions of years to create. There are other ways to provide energy to America and America needs to find ways to use less of everything, including energy.	Please see general comment response #18
Susie	Garretson	OHV Route Identification	I have already seen the destruction these have caused in Arizona, California and Utah. Unfortunately, the same people who go "off road" with their vehicles are the same people who are ignorant of what they are destroying and who like to destroy all of the wonderful rock art by shooting at it or by chipping it off or creating their own rock	The potential impacts of OHV use on other resources are analyzed in Chapter 4 of the Proposed RMP/Final EIS. In particular, impacts on

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			art over it. They have no idea of the importance of the biological systems they destroy. You know and I know they don't stay on existing roads, and that you do not have the staff to enforce the laws in these remote areas, but you must try.	cultural resources are addressed in Section 4.2.4 where it is explained that incidental damage to cultural resource sites is generally concentrated within several hundred yards of roads. The marking of trails and enforcement of OHV decisions will be addressed in a travel management plan as the RMP is implemented.
Susie	Garretson	OHV Route Identification	I ask you to fully study each route allowed for ORV's to ensure that there is little environmental impact.	Please see general comment response #19
Susie	Garretson	OHV Route Identification	I ask you to not plan ORV trails on lands within America's Redrock Wilderness Act or other wilderness study areas.	Please see general comment response #12
Susie	Garretson	Transportation and Access	I especially ask you to not plan for any areas open to unlimited ORV use.	Please see general comment response #10
Kyle	Garrett	Transportation and Access	I apologize for this letter arriving so close to deadline, but I feel strongly that my opinion, like that of hundreds of other backcountry pilots, needs to be heard. I appreciate that the BLM staff has included ‘continued use’ of the top four airstrips (in bold above), in the Support/Transportation portion of the first draft of the new RMP. I would like these to remain in the final version of the RMP. I have been flying the Utah, Idaho, Colorado, and Montana backcountry for over six years, and in that time have been able to visit literally dozens of strips in some of the most beautiful places on our planet. I would not have been able to see and explore these remote locations were it not for the backcountry airstrips at these destinations. I have personally landed at several of the strips listed in the RMP including Mexican Mountain and Hidden Splendor. On both trips, I enjoyed hiking the scenic canyons and finding Anasazi petroglyphs. I believe that visiting these important and fragile locations by air is an extremely low impact activity. My plane weighs half as much as an SUV and uses a fraction of the roadway, causing negligible impact to the runway surface. In addition, I always practice noise abatement takeoffs in sensitive areas to respect the privacy and solitude of other users in the area. I understand that there may be many more airstrips on lands within the RMP other than those listed above and respectfully request that either they be mentioned in the Plan or that some sort of official language be included in the RMP to safeguard the future casual use and visitation of these airstrips: Mexican Mountain Hidden Splendor Cedar Mountain Sage Brush Flat/Peter's Point airstrips Horseshoe Canyon	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
			Stone Cabin Gas Field Sagebrush Bench Cliffdweller Flat Gruvers Mesa Sweetwater Reef Temple Wash Thank you for your consideration of these important issues. I hope the new RMP allows for continued use of one of our national treasures...backcountry airstrips.	
Wesley	Garrett	OHV Route Identification	I own ATV's and off road vehicles and enjoy the excitement of these vehicles, but I still feel strongly that some areas should be off-limits. It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation.	Please see general comment responses #19 and #132
Jan	Garton	Minerals and Energy Resources	What is the cost to the American taxpayers in dollars for the 4 day supply of oil that the US Geological Survey says underlies the Utah site? Add to that the cost in ecological destruction, and the only ones benefiting from drilling are the oil and gas companies and their stockholders. Taxpayers once again get soaked. When will the BLM stop being a toady for exploiters and start being real stewards of the land under your care?	Please see general comment responses #1 and #18
Gerald	Gaston	Transportation and Access	I favor your preferred alternative D and the "continued uses" concept for airstrips in the backcountry. The use of my airplane to access your backcountry allows my wife and three daughters to explore different areas with very little impact to the environment. There are many strips in this area that are not listed in your RMP that should remain open to the public. Please do what ever you can to keep this beautiful land open to aircraft. Thank you for your assistance.	Please see general comment response #21
Gerald	Gaston	Transportation and Access	I am a pilot from Montana who enjoys the backcountry of Utah. I have been visiting your state for several years and find this land to be very beautiful and extremely enjoyable. I come to the backcountry of Utah in my airplane bringing my family and friends to hike and explore.	Please see general comment response #21
Aaron	Gaudin	OHV Route Identification	The few things that concern me are first, preventing off road vehicles from encroaching on the BLM lands.	Please see general comment response #19
Aaron	Gaudin	Recreation	Both motorized and non-motorized recreation should be present, without conflicts between the two. Any ecologically damaging routes should be closed.	Please see general comment responses #15 and #19
Marla	Gault	OHV Route Identification	Specifically, I am concerned about the explosion in the number of ORV's (ATVs) the drivers of which feel they have a right to go wherever they want. I urge you to work out an equitable solution for our lands and the owners of these vehicles right to enjoy them.	Please see general comment response #19
Carmen	Giancana	Minerals and Energy Resources	U.S. Geological Survey has estimated that oil and gas deposits would amount to a mere 4 days of oil and less than 4 weeks worth of Natural Gas. How can the devastation of this wildlife be justified?	Please see general comment response #18
Annie	Gibbons	Minerals and Energy Resources	Don't waste your states most precious resources, just because this present administration wants more minerals and gas exploration!	Please see general comment response #18
J.	Gibson	OHV Route Identification	As the available areas for OHV use is reduced, the concentration of the activities will have a negative impact, similar to over-grazing. The reduction in legal off-road areas will force others in to closed areas, whether knowingly or not. The proposed changes at the San Rafael Swell area reflect a reduction in use of our for public	Please see general comment responses #20, #31, #80 and #81

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			land for the general public. The San Rafael Swell area is not a National Park and should not be micro-managed as one. Group size restrictions are arbitrary and could be subject to judicial review (peaceful assembly). The BLM should clearly and openly publish the findings and effects of the Route Designation Plan. The numerous levels, or layers of management is more than confusing. In fact there are several contradictions within the proposed rules. Public land is for the entire public, not just those who have the physical ability hike all day long. All existing roads and trails within the San Rafael Swell area should remain open for OHV use. An interconnecting trail and road systems should be a key element in the management plan. The Chimney Rock/Summerville and Humbug trail systems should remain open and be linked to the Arapeen trail system. Linkage of the trail system is a safety issues for both recreational users and Search and Rescue. Why is the BLM being deceptive with regard to the Chimney Rock/Summerville Trail System? The system is designated as open, but failure to include the OHV trail system on the Preferred Alternative OHV Route designation map brings that important issue into question.	
Mark	Giese	Minerals and Energy Resources	Please do not offer proposed wilderness lands to oil companies for development.	Please see general comment responses #36 and #101
Mark	Giese	OHV Route Identification	Please ban ORV use from public lands or designate specific trails for them	Please see general comment response #19
Mark	Giese	Wilderness	Please protect citizen proposed wilderness measures at the San Rafael Swell, Desolation Canyon, etc..	Please see general comment responses #36 and #109
Seldon	Gifford	Alternative Maps	5. The plans indicate that many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. Unfortunately, most of the 'green lines' on Map 2-56 are actually CLOSED to unlicensed OHV use. How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use? Do you plan to change this?	Please see general comment responses #31 and #78
Seldon	Gifford	OHV Route Identification	2. The plans state the Chimney Rock/Summerville Trail system will be designated open, but does NOT include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. Comment: What does this kind of omission mean? Was it accidental or intentional? Regardless of the cause, it must be corrected. Your maps must be updated to accurately portray the OHV designations outlined in each alternative.	Please see general comment responses #19 and #31
Seldon	Gifford	OHV Route Identification	6. Popular OHV Trail Systems must remain open. The Chimney Rock/Summerville and Humbug trail systems should be left open. Also, please designate links to the Arapeen Trail System. All existing roads and trails should be kept open for vehicle use.	See general comment responses #19 and #20.
Seldon	Gifford	Process and Procedures	The plans propose many overlapping management "layers" in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, are not drawn along any recognizable geographic boundary making compliance virtually impossible. What's the intent with all the various management layers? Confusion? The multiple layers need to be eliminated	Please see general comment response #37

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			in favor of simpler structure. One that is not overly restrictive and impossible to understand.	
Seldon	Gifford	Process and Procedures	The plans must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. We need to know what the 'actual' impact will be!	With the exception of Alternative E, no OHV management in the San Rafael Motorized Route Designation Plan would be changed in any alternative.
Seldon	Gifford	Process and Procedures	The plans state that the San Rafael Route Designation Plan will be incorporated into the new management plan, but does not communicate the fact that other management "layers" will make significant road and trail closures.	Please see general comment response #37
Seldon	Gifford	Recreation	4. The plans propose severe group size limits. These put clubs, large families and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. There is no justification for this. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands. In my own case, the proposed limits would make it impractical for extended family to hold a family reunion in the impacted areas.	Please see general comment response #81
mike	Gilliland	Wilderness	Please do what you can to preserve wilderness areas of Colorado Plateau and manage them in such a way that general public can enjoy its natural state.	Please see general comment response #109
Richard	Gilman	Transportation and Access	The Price RMP should also have a reasonable balance between motorized and non-motorized travel plan (no RVs in wilderness study areas and inventoried lands) and should have an effective trail enforcement plan. There should be no RV use in areas proposed for wilderness designation under America's Redrock Wilderness Act. RV use should also be restricted from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	Please see general comment response #10
Joe	Ginsburg	OHV Route Identification	I urge write travel plans that will: -Allow for a reasonable balance between motorized and non-motorized travel -Include an effective trail enforcement plan. -Completely prohibit all cross-country motorized travel. -Designate and clearly sign motorized routes, but only where conflicts will other users or resource values do not exist. -Evaluate ORV impacts on all resources and uses in the planning area. -Implement effective and frequent monitoring of ORV impacts; set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs; and plan a budget for adequate enforcement of travel plans. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, the BLM should not allow ORV use. -Preclude ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems. Restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act.	Please see general comment responses #12, #15, and #19
Patricia	Glackin	Minerals and Energy Resources	Please stay out of the oil business! Please protect places like Desolation Canyon and Muddy Creek.	Please see general comment response #18
Patricia	Glackin	OHV Route Identification	Please keep off road vehicles in designated more remote areas!	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
Alexis	Goble	Minerals and Energy Resources	I feel that is it imperative to keep the oil and gas companies from developing the wilderness lands in Utah, particularly the San Rafael Swell, Desolation Canyon, Nine Mile Canyon and Muddy Creek.	Please see general comment response #18
Rick	Goldstein	Minerals and Energy Resources	It has come to my attention that BLM plans to allow gas and oil development in Redrock Wilderness area, Utah. Isn't it time to focus on conservation instead of development, especially of an area that has such small reserves?	Please see general comment response #101
Andrea	Gough	Process and Procedures	The BLM failed to consider an alternative that would protect the redrock wilderness' wild lands, wildlife and recreational opportunities. It failed to even consider whether any of the remote and untrammeled landscapes deserved permanent protection from oil and gas development. The Castle Country Heritage Plan is a reasonable, well-balanced plan, and it should be adopted by the BLM.	Alternative E would protect all areas with wilderness characteristics. Also see general comment response #35.
John	Gould	Minerals and Energy Resources	I am dismayed to see how much of what little wilderness quality land that remains in your district you appear willing to sacrifice to eke out a few days more of oil.	Please see general comment response #18
John	Gould	OHV Route Identification	The Draft Plan does NOT adequately address the burgeoning problem of off-road vehicles	Please see general comment response #19
Mainly	Grace	Minerals and Energy Resources	It has come to our attention that some of our protected lands such as our national parks are in danger of being developed for the purpose of extracting oil and gas. We are deeply concerned about this as the beauty and sacredness of our natural lands is part of what makes us proud to live in Utah. We petition you to protect our wilderness lands so future generations may enjoy them as we have, that we might now make the mistake of destroying what we can never have back. If we fight the oil companies, it will open the way of making alternative fuels and power sources a reality. Why trade something so beautiful and eternal for something so temporary and unnecessary? Please don't sell out what we have inherited for something that can never be appreciated as much.	Please see general comment response #101
Dale	Grange	OHV Route Identification	I would urge the BLM to adopt Alt . A after consideration of the deficiencies that pertain directly or indirectly to motorized recreation as detailed below.	Please see general comment response #19
Dale	Grange	OHV Route Identification	It should be obvious that a comprehensive route designation plan, or at least designating all routes as open, should be part of any final RMP.	Please see general comment response #19
Leslie	Gray	Minerals and Energy Resources	I am urging you to protect all areas within America's Redrock Wilderness Act and other special places (such as The Labyrinth Canyon corridor, Desolation Canyon roadless area, including Nine Mile Canyon, Horse Bench, Maverick Canyon, upper Rock House Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches; the Price River Wilderness Unit) from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat they offer for deer, elk, bear cougar and other wildlife.	Please see general comment response #101
Leslie	Gray	OHV Route Identification	I am writing to urge you to support the Castle County Heritage Plan; this citizen's alternative offers a solid balance between natural preservation and continued development and motorized recreation. I also urge the BLM to protect special places from the scars and other damage caused by ORVs. There should be no designated routes within Wilderness Study Areas and other lands considered in America's Redrock Wilderness Act. Other special places needing protection include; Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; the Price River proposed area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment responses #19 and #35
Leslie	Gray	OHV Route	I travel annually to Utah's red rock areas to hike and mountain bike. These are irreplaceable, God-given	Please see general comment responses #12 and

First Name	Last Name	Category	Comment	Response
		Identification	resources that have esthetic, ecologic, and recreation value far exceeding any value they might have for resource extraction. In addition, motorized recreation diminishes the appeal and wilderness characteristics of these areas. There is overwhelming support for protection of these places.	#19
Donald	Greenwood	Minerals and Energy Resources	As a petroleum geologist, I know from decades of off and on study of this area that it is a hydrocarbon rich area that is still being more clearly understood that even more hydrocarbons are potentially available. These hydrocarbons are badly needed by American society and the energy they produce is more efficient and cleaner than alternatives.	Please see general comment response #18
Donald	Greenwood	Minerals and Energy Resources	As prices rise for oil and natural gas and the will continue to rise and that rise will accelerate, more areas (such as this one) will become profitable to explore for and develop natural gas and oil. Opening up more federal lands for oil and natural gas development will provide lower cost oil and natural gas (and their competing commodities) to lower and middle class families, jobs, and economic growth.	Please see general comment response #18 and #118
Lucy	Greer	Cultural Resources	In addition, our archeological treasures need to be preserved so there should be no further exploration or development in the Nine Mile canyon.	Please see general comment response #9
Lucy	Greer	Minerals and Energy Resources	Concerning oil and gas exploration and development, the Colorado Plateau is a world class natural area and is precious to our entire country. The possibility of a few moments of oil and gas supplies does not begin to measure against that. There should be no oil and gas leasing allowed in Wilderness Study Areas, those areas previously identified by the BLM as having wilderness characteristics under the E202 process, or those lands included in America's Redrock Wilderness Act.	Please see general comment response #101
Lucy	Greer	OHV Route Identification	"Closed unless marked open" should become the policy regarding all ORV use in the Price Unit. Certainly all ORV trails in designated Wilderness Study Areas or those areas included in America's Redrock Wilderness Act should be closed and enforcement increased.	Please see general comment response #19
David	Grey	OHV Route Identification	Another factor that is overlooked is that all OHVs are not the same. Motorcycles enjoy single-track trails, ATVs require double-track trails and four wheel drive vehicles desire rugged roads. Additionally, each of these vehicles has different impacts on the land because of the differing desires and widths. Please re-evaluate your alternatives to include larger open areas for all OHV use and consider areas suitable for sustainable single-track motorcycle trails. OHVs are not all equal and require different types of areas, trails, and experiences. Do not create alternatives that assume all OHVs are the same.	Please see general comment response #79
David	Grey	OHV Route Identification	In your analysis you do not recognize the fact that much of the BLM managed public lands do not contain the dense vegetation and/or topographic constraints needed for a successful trails only plan. The open pinion-juniper, shrub land, and grass vegetation types are more conducive for open OHV play areas. The exception to this is single-track motorcycle specific trails in pinion-juniper vegetation types, and canyon areas that have the topographic constraints. For example the single-track trail Five miles of Hell is sustainable in its current condition due to the constraints of topography and the Cherry Creek single-track motorized trails near Delta, UT are sustainable in the pinion-juniper types because motorcycles are not as capable for pioneering trails as other OHVs.	Please see general comment response #19
David	Grey	OHV Route Identification	The no action alternative shows that there are presently many large areas open to OHV use off designated trails. In none of the other alternatives are any of these open areas present. This is unacceptable and does not represent a full range of alternatives considering the present uses.	Please see general comment response #19
David	Grey	Transportation and	I realize that the growth of off highway vehicle numbers has created management challenges but the fact is that	Please see general comment response #10

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		Access	the majority of users respect the land and responsibly use the open areas and trails. The solution is not to close the open areas but to work with responsible OHV users to realize solutions and help enforce the rules.	
Jonathan	Groene	Minerals and Energy Resources	Oil and gas drilling on public lands gives lie to the PUBLIC land aspect of our land and undermines optimistic hope that government cares for the welfare of the nation and not merely the largesse of mining/petroleum corporations.	Please see general comment response #18
Howard	Gross	Minerals and Energy Resources	I understand that the BLM is now determining which areas in the Price Resource Area will be left open to oil and gas leasing, drilling, and development, and which areas will be protected. I also understand that the agency's preferred alternative will leave 98% of unprotected wilderness quality lands open to oil and gas development. Surprisingly, the majority of these wilderness quality lands have been recognized by the BLM as eligible for future wilderness designation. I am an avid river runner, and have run Desolation Canyon several times. It is by far one of the most special places to me in Utah and I have returned to Utah each of the last two springs, since moving away from Utah. I come to visit its majesty, archeological resources, renewing waters, fierce headwinds, desert and migratory wildlife, carpets of globemallow, and playful rapids with my family and friends. I look forward to running it in the future. However, I will be much less interested in booking such a trip if there shall be drilling rigs and/or oil & gas wells visible from the river corridor. It would be a travesty upon the landscape and land ethic that we as a society are obliged to exercise to keep our most special places special as we practice multiple use. In the revised Price BLM Management Plan, the BLM should ensure that all lands in the Utah Wilderness Coalition's Citizens' Wilderness Proposal are set aside, and never allowed to be drilled...or even open to speculative energy leasing. These lands are critical both for scenic/wilderness qualities, and also the important habitat they offer for plants and animals. Preserving these special places now proposed for wilderness from oil and gas development will ensure that these natural wonders, critical wildlife habitat, riparian corridors, and ecologically sensitive areas will not be squandered for short-term, speculative gain. As such, I support the "Castle Country Citizens' Alternative" for the Price Resource Area DEIS. The BLM should either adopt this alternative outright, or incorporate major provisions of it into the preferred management alternative for the Resource Area. At the very least, areas included in the UWC wilderness proposal - such as the majestic and spectacular Desolation Canyon Unit - should be OFF limits to all new energy leasing, exploration, drilling and development.	Please see general comment response #18
Ravi	Grover	Minerals and Energy Resources	Do not allow oil and gas development on public lands at the expense of all other uses.	Please see general comment response #18
Ravi	Grover	Minerals and Energy Resources	Do not offer citizen proposed wilderness lands to oil companies for development.	Please see general comment response #101
Ravi	Grover	Minerals and Energy Resources	Protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear cougar and other wildlife they offer.	Please see general comment response #101

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Ravi	Grover	OHV Route Identification	Please:1. Designating every inventoried trail as motorized route should be undone as it's environmentally irresponsible. 2. Ban ORV's in wilderness areas for the safety of hikers, etc.	Please see general comment response #19
Ravi	Grover	OHV Route Identification	Designate off-road vehicle trails outside of citizen proposed wilderness areas.	Please see general comment response #12
Ravi	Grover	Process and Procedures	I support the Castle County Heritage Plan--the citizen's alternative which offers a solid balance between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Ravi	Grover	Recreation	Designate citizen proposed wilderness areas as semi-primitive non-motorized to protect them as such.	Please see general comment responses #14 and #36
Ravi	Grover	Wilderness	The BLM must protect special places from the scars and other damage caused by ORVs. There should be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that need protection include: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; The Price River proposed area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment response #36
Judith	Gulden	Minerals and Energy Resources	I do not want gas and oil drilling and roads on public land.	Please see general comment response #18
Judith	Gulden	Wilderness	You can make a positive difference in the United States of America. For wilderness and wilderness preservation.	Please see general comment responses #6 and #109
Gary	Gundlach	Recreation	I am very concerned about the apparent exclusion of trail and campsite data from your current draft management plan. I have always know n citizens who enjoy off highway vehicle (OHV) activities to be very respectful and cooperative when it comes to using public lands. Data submitted by these citizens should be included in your proposals for fair consideration. Our public lands should include considerations from all Americans, including conservationists as well as OHV users, disabled citizens, and seniors. Valid data must be included to create fair and balanced plans.	Please see general comment response #93
Ige	Gustavson	OHV Route Identification	I've also heard that numerous trails are not open to unlicensed vehicles. While I no longer ride dirt bikes, I wouldn't have been able to ride any of these trails and I don't think that is fair to the rest of the OHV community. OHV is off highway vehicles... why should it have to be licensed for on highway? The public has already lost entirely too much of our PUBLIC LANDS. Don't close off more of it. Please keep the Summerville Trail area, the Humbug Trail system and all of the San Rafael Swell open for all of us to enjoy. Also, please designate links to the Arapeen Trail system.	Please see general comment responses #19 and #31
Ige	Gustavson	OHV Route Identification	I would like to know why the BLM left the Chimney Rock/Summerville Trail System off the Maps in the Appendix for the draft plan on the SRS area? I understand that the OHV community submitted much information concerning these trail systems early on in the draft plan process and that the BLM has chosen to ignore that information...Why? I am very upset that you have chosen to ignore the OHV community at a time when it's use is becoming more and more popular and the man hours and grants and matching funds that are supplies by the OHV community is so badly needed by the BLM due to the declining recreation budgets.	Please see general comment responses #20 and #31
Ige	Gustavson	Recreation	I also object to the way the small to midsized clubs and camping groups are subject to the same permit process required for commercial enterprises. There is no justification for the size limits outlined in alternatives a through d and the management layers outlined are difficult to understand. Please correct these issues in the final EIS for the San Rafael Swell area.	Please see general comment response #81

First Name	Last Name	Category	Comment	Response
Margene	Hackney	Cultural Resources	I strongly recommend to the BLM that the nomination of Nine Mile Canyon to the National Register of Historic Places be finished as soon as possible and turned in to the State Board of History without delay. Also I do recommend that the BLM put on a full time employee to be a presence in the canyon as was written in the BLM Resource Management Plan years ago.	The process of designating Nine Mile Canyon to the National Register of Historic Places is not directly associated with this RMP process, although the RMP decisions provide protection for the cultural resources within the proposed District. This Proposed RMP would continue to implement the 1995 Recreation and Cultural Area Management Plan with minor adjustments such as VRM designations.
Margene	Hackney	Minerals and Energy Resources	I cannot endorse your 2.6.5 Alternative D, which is your preferred alternative plan. I am concerned that this plan will leave Nine Mile Canyon open to further industrialization. Please do not allow any surface occupation of extractive industries in the canyon that will take away from the prehistoric and historic character of this magnificent place.	Please see general comment response #18
Margene	Hackney	Process and Procedures	I have been researching the Castle Country Heritage Plan- the citizens alternative which offers a solid balance between natural preservation and continued development and motorized recreation for all areas in your plan. It seems like a plan that will satisfy almost everyone. I endorse this plan.	Please see general comment response #35
Jack	Hadden	Process and Procedures	I feel that you don't give enough media attention on public meetings to inform the public enough on the meeting.	Please see general comment response #145
Amy	Hadden Marsh	Minerals and Energy Resources	No one wants to see any of it torn up for gas and oil drilling, especially considering the mess made of Wyoming and now Western Colorado at the hands of gas drilling companies. I would like to invite you to Garfield County, Colorado, to take a look at what's happening to our mountains as result of this country's rush to drill. Please don't let that happen to Utah's public lands. The footprint will last for much longer than that left in Colorado. I remember hiking along trails in Utah beside cryptogamic soil. There were markers next to some of this soil, telling me not to step on it because it took so long to create itself. Are you going to tell the gas drillers the same thing? It's not like Colorado where after a few decades and some revegetation assistance, the land will repair itself. Utah doesn't work that way. Are you willing to be responsible for the ruination of millions of acres of fragile desert? Is that the legacy you want to leave? Is this what you want people to remember you for?	Please see general comment response #18
Dale	Hadley	Alternative Maps	BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. I will not tolerate this kind of deception.	Please see general comment response #31
Dale	Hadley	OHV Route Identification	The OHV community deserves to be treated with respect. BLM maps must be updated to accurately portray the OHV designations outlined in each alternative. BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. Sadly, most of the 'green lines' on Map 2 are actually closed to unlicensed OHV use. How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use?	Please see general comment responses #20 and #78
Dale	Hadley	Recreation	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	The Draft and Proposed RMPs do not make any changes to the San Rafael Route Designation Plan except for certain areas that were left open until the decision was made to designated roads and trails. Those decisions have been made in the Proposed

First Name	Last Name	Category	Comment	Response
				RMP.
Dale	Hadley	Recreation	There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment response #81
Maxine	Haggerty	Minerals and Energy Resources	I'm writing out of concern for the long-range future of the lands managed by the Price Field Office of the BLM, which would be opened to oil and gas leasing, exploration and drilling under your proposed Resource Management Plan (RMP).	Please see general comment response #18
Maxine	Haggerty	OHV Route Identification	Nor should areas under the Redrock Wilderness Act be opened for unlimited and destructive use of Off-Road Vehicles (ORVs).	Please see general comment response #12
Maxine	Haggerty	Wilderness	I strongly encourage you to strike a balance and seriously consider adopting the Castle Country Heritage Plan, a citizen alternative that aims to protect the areas within America's Redrock Wilderness Act from harmful actions that will ruin the wilderness character of these beautiful lands.	Please see general comment response #111
Roger	Haglund	Minerals and Energy Resources	Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development	Please see general comment response #18
Robert	Hale	Minerals and Energy Resources	Energy Development-RMP should steer energy development to lands outside of wilderness quality and likely wilderness quality lands. SRMA's and ACEC's. Do not lease these sensitive wilderness and recreational lands until you have leased other PFO lands and the leases have been developed. Only if the leased areas are producing a significant amount of energy should nearby sensitive wilderness quality or recreational lands even be considered for leasing. The value of wilderness quality and recreational and ACEC's outweighs the amounts of energy likely to be found which will be such a tiny fraction of our annual energy usage.	Please see general comment response #18
Robert	Hale	OHV Route Identification	Policy of Closed unless designated open, being shown open on a map and posted at the trail is the only policy that can be enforced and monitored.	Please see general comment response #19
Robert	Hale	Vegetation	7)Invasive weeds are a serious problem that degrade natural resource values. RMP needs to contain an invasive weed monitoring and management program.	Please see general comment response #24
Robert	Hale	Visual Resources	Wilderness quality lands (WSA and 1999 BLM inventoried wilderness quality lands) should be maintained VRM I. Special Recreation Management areas and ACEC's should be maintained at VRM I or II throughout.	Please see general comment response #140
Robert	Hale	Wilderness	Wilderness quality lands are irreplacable resources and should be protected in the planning process from disturbance. Wilderness quality lands comprise the existing WSA's and Non-WSA's (Table 3-19) that were identified in 1999 by the BLM to be of wilderness quality. These lands totally approximately 1,040,000 acres must be closed to energy leasing and road building in the RMP. These lands need to be maintained VRM I. These lands need to be closed to OHV usage. Likely Wilderness quality lands (Table 3-20) should be reviewed formally in a public process for wilderness qualities and protected from energy leasing and road building until they are analyzed.	Please see general comment response #36
Marty	Hall	Minerals and Energy Resources	It is very important to the future of our nation that all areas with potential hydrocarbons resources are analyzed. Utilization of low impact seismic exploration should be encouraged in order to determine those areas that should be held open for development, as well as identifying the remaining areas that do not need to be considered for leasing. Only if we take this approach throughout all areas of the country will the United States have a reasonable chance at a secure energy future.	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
Harvey	Halpern	OHV Route Identification	I feel that designating every inventoried route in the swell as open to motorized vehicles both irresponsible and unacceptable. Please severly limit where motorized vehicles can tread in the revised Price RMP.	Please see general comment response #19
Chad	Hamblin	Cultural Resources	To Preserve the historic, archaeological, and wilderness qualities of the Nine Mile Canyon/Desolation Canyon for future generations I ask you to please take the following actions: Re-route oil and gas traffic up the sunny-side/east carbon access route, rather than in the bottom of Nine Mile Canyon. Don't allow any siesmic testing or well drilling in the bottom of Nine Mile Canyon. Designate citizen-proposed wilderness areas as closed to oil and gas leasing and closed to off-road vehicles. Make archaeological protection the top priority in the region, since these resources are unique and irreplaceable.	Please see general comment response #9 and #13
Clint	Hamilton	Transportation and Access	We respect the land and restrict ourselves to the trails. I know if you start closing off trails you will force people to disobey the restrictions so they can ride different areas. It is not any fun to ride in circles in a small area. OHV riders need all the trails that can be made available to them so they can enjoy the different types of views to see. There needs to be enough trails systems that will interconnect with other trail systems such as the Arapeen trial system. Myself and our group feel we a right to enjoy all of the established trail systems available to us in Utah. I don't believe closures are warranted, and I feel if you do close these trails you are disregarding my rights as a tax paying Citizen of this State.	Please see general comment response #10
Bruce	Hammon	OHV Route Identification	I'm a 63 year old male that has been a responsible ATV and motorcycle owner all my life. Mid to older people are buying ATV's at a fast rate. The majority are like myself . AX paying , responsible older people who can no longer hike for long distances carrying large packs. I myself have a leg injury that prevents me from hiking long distances. We are in the majority and want access to OUR public lands through controlled and maintained trails. Myself and my friends stay on the trails and confront anyone doing harm to the environment. Seems the one's that don't like motorized travel are the one the get involved with closing issues more than us. But they are in the minority and some day they will be 63 (my age) and still want access to public lands. They already have enough land for hiking only. There are many just like myself that don't take the time to write but believe me we are the majority.	Please see general comment response #80
Keith	Hammond	Alternative Maps	Unfortunately none of the alternatives are what I would like to see. I looked at the so-called Castle Country Heritage Plan and I like the maps I have seen. I think it is a wise compromise -- it allows oil and gas development where appropriate, allows ATVs and other off-highway vehicles where appropriate, but also protects the lands that are suitable for permanent wilderness protection, preserving Congress' prerogative to examine and then designate suitable areas. Again, we all know much more is suitable than just the existing WSAs. We need to find a way to hold onto those other wild areas outside the WSAs, before they are whittled down to nothing and lost.	The planning team developed and analyzed a full range of alternatives, as required by law, regulation, and policy. The alternatives were developed through the interdisciplinary team process that included BLM staff specialists, cooperating agencies, and public input. Importantly, the alternatives were crafted to be responsive to the issues, concerns, and opportunities identified for resolution in the planning process. Further, in the development of the plan alternatives, BLM also considered the planning decisions in the existing 1983 Price River Management Framework Plan (MFP) and the existing 1991 San Rafael Resource Management Plan (RMP) that were still valid and responsive to the issues.

First Name	Last Name	Category	Comment	Response
				BLM gave careful consideration to the Castle Country Heritage Plan (CCHP), and in fact, incorporated parts of the plan into the range of RMP alternatives. While the CCHP is multiple-use in nature, it doesn't meet the purpose and need for the land use plan as it does not address all resource values and uses BLM is required to manage on public lands. BLM has reviewed the CCHP and compared it to the range of alternatives analyzed in the Draft and Final EISs. The range of alternatives in the RMP encompasses the CCHP; therefore the CCHP is not carried forward as a separate alternative. BLM used the information presented in the CCHP in the refinement of the proposed OHV motorized route designation plan. The Supplement to the Draft Resource Management Plan/Draft Environmental Impact Statement and the Proposed RMP/Final EIS describes and analyze the impacts of a sixth alternative (Alternative E) for managing the public lands administered by the Price Field Office with an emphasis on protection of non-Wilderness Study Area (non-WSA) lands with wilderness characteristics.
Keith	Hammond	Minerals and Energy Resources	Too many leases and APDs are issued in wilderness-suitable lands without exhausting other options first. This is an important long-term management principle – sacrifice wilderness and roadless values only if absolutely necessary -- that I don't see anywhere in your alternatives. On a piece of wild and roadless ground, I want the BLM to require No Leasing, or No Surface Occupancy or other tough stipulations that protect these wild areas -- make the drillers go in sideways with a slant rig, or access the same field from outside the wilderness suitable area, or exhaust non-wilderness fields before we sacrifice our last wilderness-- make them work for it and don't just give up these roadless values so fast. Wilderness is one of the most precious resources that BLM manages in the West and it should not be cashiered within a generation or two, just for one industry or political party. I want long-term stewardship and conservation of wildland values and I do not see a strategy in this RMP for doing that. You are basically zoning all lands outside the inadequate WSAs as open for leasing, with no plans to hold back special areas... it really needs more balance and more of a long-term stewardship ethic. Specifically, the Green River corridor and Book Cliffs areas are some of the wildest lands remaining in the lower 48 United States. I want the absolute toughest restrictions on drilling in these areas. It is not legal for BLM to elevate oil drilling to "Number One Priority" -- you must manage for multiple use, and preserve a range of values, and wilderness is the highest value in many of these areas. We need more balance and this RMP is not there yet.	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
			I support the "Citizens Alternative" developed by SUWA and the other conservation groups -- preserve this wilderness, allow leasing elsewhere.	
Keith	Hammond	Minerals and Energy Resources	BLM has been letting our wilderness opportunities slip away forever, into the pockets of oil speculators, and I urge you to take a tougher new direction so this won't happen.	Please see general comment response #101
Keith	Hammond	OHV Route Identification	BLM must finally designate roads and trails in the RMP, and fully analyze their ecological impacts and user conflicts, in the environmental impact statement. I firmly believe that all BLM managed areas should be managed as "Closed unless signed Open" to ORVs, with the exception of designated play areas. The Price RMP should not designate any "open areas" where ORV use is allowed without limitation -- even play areas must be regulated so the land isn't destroyed, this is fragile desert. I also urge you not to designate ORV trails within lands proposed for wilderness designation in America's Redrock Wilderness Act - especially not in existing WSAs like Sids Mountain. Sids Mountain is the best sheep habitat in your district, and hunters have had it up to here with ATVs destroying hunting opportunities in these last wild corners of Utah. Please close all routes in Sids that disturb wildlife, wildlife is by far the more valuable resource in Sids. Also, Devil's Racetrack and other "existing" routes that are damaging this WSA have got to be closed, they are impairing wilderness values of the unit and that's illegal by BLM's own rules. Please find the will and the way to get it done. Already it is virtually impossible to hike or ride horses out of earshot of ATVs and dirt bikes in the entire Swell. I have been spooked and then verbally threatened by dirt bikers in Muddy Creek, which should be closed to vehicles in the first place. I see extensive ORV damage, increasing every year, in Wild Horse, Little Wild Horse, Bell, Cistern, and other canyons in the existing WSAs which are already signed closed but are continually violated by riders. They're getting deep into Chimney Canyon, which is one of the Swell's most pristine and environmentally rich canyons. I have sat and watched entire families on ATVs illegally going cross-country and tearing up soils within sight of the BLM ranger's trailer right outside Temple Mountain, without a care in the world. And Factory Butte over the years has gotten out of control, lately it is just a field of illegal user created trails and high marking, spoiling one of the most photographed scenic features in Eastern Utah. We need more enforcement, especially in these high-use, easy-access areas that get so much weekend and holiday traffic from ORVs.	Please see general comment response #19
Keith	Hammond	OHV Route Identification	This is why I want BLM to designate open trails in this RMP and close all the rest -- so that real enforcement can finally begin. With respect, you have waited too long to do route designation and we are suffering the damage from even well-meaning riders who don't know what's open, what's closed, what's damaging, and whether anyone ever gets cited for illegal travel. This is the biggest issue for me and many others like me who travel to Utah's federal lands to enjoy wild canyon country and end up drinking crankcase oil out of potholes in canyons that should be -- or are supposedly already -- closed to vehicles. ORVs are a rapidly escalating problem and I strongly urge you to take firm control of it in this RMP, before the whole Swell is degraded by inappropriate travel.	Please see general comment responses #15 and #19
Keith	Hammond	Wilderness	In general I urge you to protect areas proposed for wilderness in the legislation America's Redrock Wilderness Act from oil and gas leasing and drilling. Allowing companies to develop these lands causes soil damage and erosion, spoils wildlife habitat, and ruins riparian areas. It destroys backcountry recreation and wilderness opportunities for the public, forever. I have had enough of one user group -- oil and gas companies -- getting carte blanche to destroy public backcountry areas when other options exist. If it costs them a little more to develop oil in a way that	Please see general comment response #36

First Name	Last Name	Category	Comment	Response
			protects the nation's wilderness, so be it -- please protect national wilderness first because it cannot be replaced.	
David	Hanna	Process and Procedures	The Nine Mile Canyon should not be subjected to the exploration activity or serve as access routes for the pipeline or drilling trucks. The mining company has another access route to the mesa through Sunnyside and East Carbon County. I strongly urge my government and BLM to prohibit further exploration pipeline access or drilling truck access through Nine Mile Canyon. Finally, please consider favorably the citizens wilderness proposal for this area and respect its value.	The Draft RMP/DEIS does analyze a range of alternatives that would require various levels of protection for citizen-proposed wilderness areas. These protections include limiting off road vehicles to designated areas, oil and gas limitations, VRM requirements, and other special designations such as ACECs and SRMAs. The bottom of Nine Mile Canyon would be protected with these requirements. Wilderness character of WSAs would be protected under all alternatives and an alternative that would manage all non-WSA lands with wilderness characteristics in a protective manner is analyzed as Alternative E in the Supplement to the DRMP/DEIS and Proposed RMP/Final EIS. Also see general comment responses #13 and #36.
Alma	Hansen	OHV Route Identification	I have enjoyed the San Rafael area in my four wheel drive vehicle for the past 15 years. I have taken my family to places we could have never gone without motorized transportation. Closing and restricting travel in the San Rafael makes no sense to me. There are roads and trails there that have been open for years and years. Please do not close them down and shut us out. I am almost 50 years old now and there is now way I will be able to hike the area. If you close the roads and trails it will be a lock out for me. Please keep the Chimney Rock Summerville and Humbug trail systems open. All of the popular OHV Trail Systems must remain open.	Please see general comment responses #19, #20, and #80
Alma	Hansen	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. There is no reason to have such a restrictive recreation management plan. As a long time user of the San Rafael I will not tolerate overly restrictive and impossible to understand restrictions. I do not want to feel like a criminal while I traveling on BLM land. I oppose the management layers that are being proposed. Keep it simple! Your BLM maps must be updated to accurately detail the OHV designations outlined in each alternative. How many miles of OHV routes on Map 2-56 are currently illegal for me to travel? Do not close established routes. Nothing will be harmed by leaving trails open and it will bring countless hours of enjoyment to thousands of people. Keep it open and reopen what you have closed.	Please see general comment response #20, #31, and #32.
Lourey	Hansen	Minerals and Energy Resources	The Price District RMP is contrary to having a national energy plan focusing on domestic energy production. The preferred alternative should be re-written. I disagree with the approach of limiting unnecessarily land with valuable gas deposits from development. The BLM is leaning to heavily on "land preservation" and away from economic benefits to those of us who actually live in Eastern Utah.	Please see general comment response #18
Lourey	Hansen	Minerals and Energy	The Price District RMP is contrary to having a national energy plan focusing on domestic energy production. The	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
		Resources	preferred alternative should be re-written. I disagree with the approach of limiting unnecessarily land with valuable gas deposits from development. The BLM is leaning to heavily on 'land preservation' and away from economic benefits to those of us who actually live in Eastern Utah.	
Mary and Judy	Hansen	OHV Route Identification	This is a very legitimate form of recreation in this area (OHV), and it is getting bigger all the time. This is something every person young and old can enjoy. I think the BLM should be more accommodating. Leave the land alone so we can enjoy it. I think that the BLM has closed enough roads and trails in the past that we don't need any more closed. Let us enjoy what is left to enjoy.	Please see general comment response #19
Mary and Judy	Hansen	Process and Procedures	I highly recommend scraping the whole DRMP. I can't see why we can't continue like we have in the past, seems like we get along fine until someone or some organization has to start hate and discontent and get everyone stirred up and there are usually not even from this area and don't know what they are talking about. It's time the BLM in this area listens to the local governments, people businesses and anything that pertains to this area. Stand up for the needs of this area and not to someone or an Organization that has nothing to do with the area.	Please see general comment response #142
Mary and Judy	Hansen	Wilderness	I wasn't aware that the BLM in this area is ignoring congress's wishes by closing areas that are not to be closed, even though I have heard this. It's like giving a chicken hawk a little authority, before long he thinks he's an eagle. Sounds like it's time for a management change at the BLM.	Please see general comment response #108
Russell	Hansen	Minerals and Energy Resources	I am writing this letter in the hope that you will use all discretion in allowing oil and gas development in the areas of your jurisdiction. I prefer that there be no exploration at all because the inevitable road building will destroy the pristine nature of any area.	Please see general comment response #18
Steven	Hansen	ACEC	I am pleased that the RMP proposes that Nine Mile Canyon and Range Creek be designated as Areas of Critical Environmental Concern (ACEC). These public treasures certainly fit the FLPMA criteria of "lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes...". Therefore, I urge you to designate Nine Mile and Range Creek Canyons as ACECs.	Please see general comment response #30
Steven	Hansen	Cultural Resources	Nine Mile Canyon has been internationally recognized, not only for its world renowned prehistoric rock art, cultural sites, outlaw and ranching history, and early "non-City of Zion" settlement pattern (a rarity in Utah), but is now officially recognized nationally as one of America's most endangered historic places. Better than any museum exhibit viewed from behind locked panes of glass, Nine Mile Canyon as well as Range Creek offer its many visitors opportunities to view and experience fortresses, pithouses, granaries, artifacts and rock art in much the same context that existed when the Fremont people hunted, farmed and roamed the canyon a thousand years ago. Nine Mile Canyon offers its visitors the worlds fines examples of Ute, Fremont and Desert Archaic petroglyphs and pictographs available, and they can still be viewed while hearing the songs of the canyon wren, towhee and scrub jay - probably descendents of those very birds that provided nature's music to the Archaic people many millennia past. These resources, as well as historic ranches, roadways and outlaw cabins make Nine Mile Canyon eligible to be included on the prestigious National Register of Historic Places, and I encourage the BLM to see that this designation be completed soon.	Please see general comment response #9 and #13.
Steven	Hansen	Cultural Resources	The draft RMP's preferred alternative D leaves out vast, archaeologically rich areas that deserve a special management status. Only SRMA alternative C would adequately protect these extremely sensitive resources and I therefore urge you to implement alternative C for the Nine Mile Canyon area.	Please see general comment response #9
Steven	Hansen	Minerals and Energy Resources	The oil and gas industries have the right, and should be able to exploit their legally-held leases, providing they do so under the most responsible and unobtrusive methods, insuring that other uses of the multiple resources remain primarily unaffected by their activities. Unless the preferred alternative D were modified to require an	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
			unwaivable no surface occupancy (NSO) designation within the Desolation Canyon and Jack Canyon WSA/WIAs, alternative C provides the only compatible option for fluid mineral leasing. Extractive industries need to provide for maximum protection of the area's prehistoric and historic cultural resources, as well as recreation and wildlife resources. This can be accomplished by being sensitive to and respectful of the area's various and unique public treasures and uses. Protection and respect for other uses require that technology such as directional drilling from fewer drill pads be employed, requiring that industrial commute routes avoid the National Backcountry Byway, and strictly enforcing an unwaivable NSO standard within the proposed ACECs and WIAs.	
Steven	Hansen	Process and Procedures	Except for a few short cherry-stem roads on the preferred alternative that lead to no definite destination and that seem to be nothing more than cattle ranching access tracks, the "citizen's alternative" known as the Castle Country Heritage Plan is very similar regarding OHV Route Designations in the Nine Mile Canyon region. I therefore urge you to adopt the Castle Country Heritage Plan for OHV Route Designations. Doing so would allow access across a wonderful existing trial that runs across spectacular Horse Bench, while also allowing archaeologically-rich Jack Canyon and lower Nine Mile Canyon to be added to the National Wilderness Preservation System... The National Trust for Historic Preservation's listing of Nine Mile Canyon as one of America's 11 Most Endangered Historic Places is largely the result of poor resource management practices and planning by the counties, State of Utah and BLM. It is an impediment to Carbon and Duchesne Counties, the State of Utah and the American taxpayer in realizing the economic benefits of the fast growing and long-lasting heritage tourism industry in this region.	Please see general comment response #35
Steven	Hansen	Visual Resources	The scenic and primitive nature of lower Nine Mile Canyon and Jack Canyon, located within the WIA should be afforded a Visual Resource Management classification of 1 (VRM1) and all other areas within the preferred ACEC designation should have a VRM2 classification, as proposed in the Special Recreation and Cultural Management Plan adopted by the BLM in 1994-95. These classifications are consistent with the removal of existing natural gas compressor stations at Water Canyon and Sage Brush Flat, and the burying of all natural gas pipelines currently underway in Nine Mile Canyon.	Please see general comment response #140
Steven	Hansen	Wild and Scenic Rivers	Perennial Minnie Maud (Nine Mile) Creek has served the needs of people and cultures for nearly ten thousand years, as evidenced by the prolific prehistoric cultural and historic sites that line the canyon. The same is true of Range Creek and Rock Creek. For this reason, I encourage you to include Nine Mile, Range and Rock Creeks into the National Wild and Scenic Rivers System.	Please see general comment response #27
Steven	Hansen	Wilderness	Having explored extensively the area identified as non-WSA lands with wilderness characteristics (WIA) in and around lower Nine Mile Canyon, I concur with the assessment that this area does in fact meet wilderness criteria. It is my belief that a roadless wilderness designation in the Desbrough and Jack Canyon WIA units would provide the best protection for this archaeologically-rich public treasure by allowing gas and future generations to experience Nine Mile Canyon in the same context the Fremont experienced it. Therefore, I recommend that BLM change the rating of 'semi-primitive, non-motorized" to a rating of "primitive" for lower Nine Mile Canyon on the recreation Opportunity Spectrum and as such, I must urge you to adopt alternative C for withdrawal from locatable mineral entry and areas closed to mineral materials disposal within these WIAs. Preferred alternative D is inadequate in that it leaves Nine Mile Canyon fully open to mineral extraction and disposal in an area proposed for ACEC designation under the same preferred alternative.	Please see general comment response #109
Virginia	Hansis	Minerals and Energy Resources	Furthermore, I urge you not to offer proposed wilderness lands to oil companies for development. These natural wonders should not be destroyed for short term, speculative gain.	Please see general comment response #101
Virginia	Hansis	OHV Route	Designate specific trails for ORV use. The BLM should develop enforcement plans to ensure the protection of	Please see general comment responses #15 and

First Name	Last Name	Category	Comment	Response
		Identification	other wilderness landscapes.	#19
Evan	Hanson	Minerals and Energy Resources	Minerals are important to develop in a responsible way. Stipulations should be addressed based on the specific request not in a one size fits all manner that this RMP is too quick to impose. I challenge you to show evidence of unreasonable impacts to the region that are not being mitigated and reclaimed to as good or better conditions than existed before development.	Please see general comment response #18
Penelope	Hanson	Minerals and Energy Resources	The Government's own geological survey suggests the amount of extract would be negligible. In a time when our environment is under ever-increasing pressure from business expansion, and when the known deadly effects of oil and gas use on our atmosphere are threatening our survival as a planet, we need to look immediately to alternatives. Continuing to seek out and use fossil fuels smacks of the Roman Emperor who fiddled while the city burned. Yes, our American way of life will be affected; many will whine and cry about limitations on our extravagant energy use; and, it is about time that we, the American people accepted both our responsibility and accountability to the earth we live on and to those future generations who deserve to live on a healthy planet	Please see general comment response #18
Michael	Haraldson	Minerals and Energy Resources	I am writing to ask you to protect the Utah Redrock Canyon lands from oil and gas drilling and over use and abuse by off road vehicles. The precious lands we have need to be protected from over use and exploitation in obtaining oil and gas rights. These lands should be preserved for hunting and recreation that will not harm the environment. These areas should remain as places of beauty for all those who wish to protect our great country of America.	Please see general comment responses #18 and #36
Kara	Harbert	Minerals and Energy Resources	Potential oil/gas development along the GR. It pains me to think of the consequences that yield a very short term gain (for the oil/gas industry) and a long term, potentially definite loss (for visitors, the area, and its inhabitants.) It is even more incredible that such short term gains in the form of oil/gas drilling would be allowed- invited even- to threaten this treasure.	Please see general comment response #18. Under all alternatives, most lands along the Green River would be closed to leasing. The areas not closed would be NSO. VRM and other classifications overlay the entire river corridor under all alternatives.
Kara	Harbert	Wilderness	Proposal to protect this area, specifically all of the Book Cliffs- Desolation Canyon Wilderness, and work to expedite its status to a wilderness Study Area. UWC proposal to protect all of the Book Cliffs - Desolation Canyon area.	Please see general comment response #108
Harry	Harden	Transportation and Access	I lived in NH until my recent move. I have over 25,000 hours of flying time and I have flown though out Utah a number of times. My family and I thank you for your help in allowing the old landing strips to be kept alive and used for camping and hiking and just exploring. We have been to a number of them such as Horseshoe Canyon, Hidden Splendor, Cedar Mtn, and the wonderful Mexican Mtn. I have always firmly believed that one of the lowest impact ways to access public lands is from the air.	Please see general comment response #21
Margarite	Hargrave	Transportation and Access	I support your preferred alternative D. There are several more airstrips which are on lands within the RMP, that are missing from the plan. These include: Horseshoe canyon, stone cabin gasfield, sagebrush bench, cliff dweller flat, grover mesa, sweetwater reef, and temple wash.	Please see general comment response #21
Margarite	Hargrave	Transportation and Access	I would like to request there be official language in the RMP to include them (additional air strips), preserving them from my future use. These include: Horseshoe canyon, stone cabin gasfield, sagebrush bench, cliff dweller flat, grover mesa, sweetwater reef, and temple wash. I and my family are identical to other users, we enjoy hiking, camping, exploring and relaxing at these airstrips, the only difference being that we access them with a low impact method from the air. Please include our access via airstrips in your RMP so we may continue to enjoy each of these valuable airstrips.	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
Steve	Harless	Transportation and Access	I am a regular user of airstrips at Dolores Point, Mineral Canyon, Horseshoe Canyon, Hidden Splendor, Mexican Mountain and others. I support the BLM plan laid out in Alternative D.	Please see general comment response #21
David	Harrison	Wilderness	Unfortunately, the Draft RMP does too little to protect wilderness and leaves way too much land open to abuse by off-road vehicles. I support the Castle County Heritage Plan, which offers a good balance between preservation and development and motorized recreation. I urge you to protect the wilderness quality lands from damage from ORV's. There should, for example, be no designated ORV routes or roads in Wilderness Study Areas and other lands within America's Redrock Wilderness Act. These areas should be protected from oil and gas development. Specifically, this should include such places as the Price River Wilderness Unit, Labyrinth Canyon corridor, and the Desolation Canyon roadless area. The energy which might be gained from these areas would represent an insignificant contribution to our nation's needs, yet the scarring of these invaluable wild lands would last forever. Other special places deserving of protection include the San Rafael Knob and Behind the Reef, the Price River, and Chimney Rock.	Please see general comment responses #35, #36 and #101.
Amy	Hartline	Minerals and Energy Resources	The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear, cougar and other wildlife they offer.	Please see general comment response #18 and #36
Amy	Hartline	OHV Route Identification	I urge the BLM to protect special places from the scars and other damage caused by ORVs.	Please see general comment response #19
Brit	Harvey	Minerals and Energy Resources	Please protect Utah wilderness-quality land by limiting oil and gas drilling .	Please see general comment response #101
Brit	Harvey	OHV Route Identification	Please protect Utah wilderness-quality land by limiting off-road vehicle travel.	Please see general comment responses #12 and #19
Paul	Hauser	Transportation and Access	My family and I have accessed these “airstrip trailheads” now for many years for camping, hiking, and exploring. We have flown into Hidden Splendor to explore the Muddy Creek drainage through “the chutes” or to “hike” Seger’s Squeeze. We have also flown into Mexican Mountain to hike the black box of the San Rafael or to just show my little boy the pictographs or to camp under the huge cotton wood trees along the airstrip. There are so few of these aircraft trailheads left in this country. Please safeguard these airstrips for future low impact visits by including official language in the new RMP that preserves them for future access. We support your Alternative D.	Please see general comment response #21
Robert	Hawkins	Minerals and Energy Resources	The Bush administration's plans to open the wildlands of Utah to oil and gas exploration are irresponsible. These beautiful, wild areas should be preserved for future generations, not exploited for those of us now alive and unwilling to focus on energy efficiency. We need to learn how to use our resources in less wasteful ways, not just find more resources to use up.	Please see general comment responses #18 and #36
Linda	Haynes	Minerals and Energy Resources	Can the US possibly develop their oil and gas properties on these public lands and still maintain most of the beauty and sanctuary they hold. I think so.	Please see general comment response #18
Mike	Headrick	Transportation and Access	I would like to let you know how much I appreciate the BLM staff including "continued use" of Mexican Mountain, Hidden Splendor, Cedar Mountain, Sage Brush Flat/Peter's Point in the Support/Transportation portion of the new RMP and that you support their own preferred Alternative D. There also are more airstrips within the RMP that my family enjoys visiting by aircraft. It would be nice to have some form of protection for these other airstrips. My	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
			family enjoys the access that these airstrips give us, we can visit areas that are not overcrowded.	
Joan	Heaps	Process and Procedures	As I perused the two volumes I found that my viewpoints are best supported by Alternative C. I have selected just a few items to comment on especially: 1. No OHV's except for emergencies and scientific and research purposes. These vehicles put great stress on the wildlife, add pollution to the air and destroy or damage the fragile flora and fauna. 2. No transmission towers and power lines. No communication towers. No gas lines and no solar farms. No coal mining. It not only spoils the landscape, but also pollutes the streams. No oil drilling. The taxpayers should not have to subsidize the energy companies to the detriment of our national parks. When I looked at the maps concerning gas, coal, and liquid fluids, it appeared to me that every part of the area was vulnerable to energy exploration and exploitation. 3. Total acres to possibly be surfaced seemed extreme. 4. No disposal of mineral materials. 5. I do not believe that livestock should even be grazing on our federal lands. I think that the wild horses, burros and all the other wildlife should take preference over all the grazing cattle and sheep. When it is absolutely necessary to capture wild horses and burros, for those that are not adopted, I would like to see the use of immunocontraception used and the animals returned to the wild. I don't think that any of us would like to be detained indefinitely in a holding pen, and no such fate should befall our wild horses and burros. 6. I know that you operate on a very limited budget, but I would like to see the wetlands, trees, shrubs and grasses restored and maintained as they were meant to be. All invasive plants should be eliminated or at least controlled. I feel that all public lands should be maintained in their natural state as much as humanely possible. We should not make such a footprint upon the land and water that it will be destroyed and future generations will loathe what we have done to the environment.	Please see general comment response #1
Hannah	Hebertson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment responses #12 and #15
Nicholas	Hebertson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment responses #12 and #15
Peter	Hebertson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Bill	Heffner	OHV Route Identification	I am aware that the proposed RMP includes considerably more than just recreation, but at this time I want to limit my comments to this one area. I would like to offer my support to the BLM in any way to better manage the use of ORV's in public lands. I am willing to concede that the majority of riders are responsible users and will stay on designated routes, but the nature of these machines [the power and off-road capability] will test the maturity of any user and, as time has proven, it seems to take only a small percentage of abusers to wreck considerable damage on a fragile desert eco-system. The popularity of these machines is rapidly pushing this situation to a point of being out of control. I	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			lived in Arkansas for twenty years, designed and built trails for the US Forest Service. The eco-system there is much more forgiving to abuse than our high desert. Over those years I watched the growth of ORV use in those forests and the damage that resulted. After years of trying to work with these groups, one of the Districts elected to simply close off that whole piece of forest to any off-road use. It may come to that here, but before such drastic measures, I would support more user education and restrictions on BLM managed lands. The process of ending the damage must start now.	
Lorraine	Heh	Minerals and Energy Resources	The US Geological Survey estimates that oil and gas deposits under America's redrock wilderness would amount to only four (4) days worth of oil and less than four (4) months worth of natural gas and opening too much land for off road vehicles which have already ruined the property that they have the ability to ride.	Please see general comment response #101
Matthew	Heimburger	OHV Route Identification	I am also concerned about rampant ORV use and abuse in Utah's BLM lands. I have seen it myself in the San Rafael Swell, and across many BLM lands in the Hanksville area. I am not against measured and controlled access for such machines on particular paths, but right now it appears that ORV users control 95% of all trails, while other users who do not impact the land on any such scale must scramble to find a place of true solitude.	Please see general comment response #19
Matthew	Heimburger	Wilderness	My concern is that lands with wilderness qualities are being defined principally for their potential resources rather than their inherent ecological worth. I speak specifically of the lands within Nine Mile Canyon, Desolation Creek, and the Muddy Creek area. While I know there may be resources within them, their value as aesthetic wonders far outweighs whatever short-term gains could come of them from resource extraction. Once these specific lands are altered, they are forever altered. Nine Mile Canyon has such archeological and cultural value; Desolation is a mecca for rafting; and Muddy Creek could and should be a hikers paradise. What's interesting for me is that such outdoor uses do not preclude other potential uses, while resource extraction often excludes all others. I have seen the final result of oil and gas exploration south of Vernal, and am not impressed with industry's track record in respecting the lands it requires for short-term profit. Surely, we must look at what has happened to date as we determine what should happen in the near future.	Please see general comment responses #36 and #109
Josh	Heino	Socioeconomics	Please register my objection to the adoption of the preferred alternative in the proposed Price District RMP without an adequate study of the socioeconomic impacts on our area. I support a national energy plan and feel the Price District RMP is heading in the wrong direction. I hope a new alternative can be found based on a true economic review. I support the BLM developing a new version of alternative D with an increased review of the positive benefits of oil and gas and coal development.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. No additional alternatives will be considered. The BLM believes the five alternatives which range from conservation management to complete development along with the No Action Alternative address a reasonable range of alternatives. See general comment response #132.
Gernot and Ava	Heinrichsdorff	OHV Route Identification	PLEASE limit ORVs to specific tracks and enforce that, and stop oil and gas testing and drilling in these wonderful redrock lands. We realize that your funds, like everybody's, are too limited to do all you would like to do. But please consider these points.	Please see general comment response #19
Dave	Helgeson	OHV Route Identification	Popular OHV Trail Systems must remain open for public enjoyment. We believe that all of the Chimney Rock/Summerville and Humbug trail systems should be left open. Please designate links to the Arapeen Trail	Please see general comment responses #19, #31, and #37

First Name	Last Name	Category	Comment	Response
			System. We don't believe there is justification for the kind of group size limits proposed in any of the alternatives. BLM states the chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. We oppose all the management 'layers' outlined in the draft plan.	
Julia	Hendrian	Minerals and Energy Resources	In the current century, BLM policy needs to become enlightened. Although oil and gas commodity prices stand at historically high levels, these are finite, wasting resources. Wildlands, if protected, will be around a lot longer to be available to visitors and support the local economy. Protect the finite wildlands at the expense of refusing drilling rights to oil and gas companies and cracking down on ORV off-trail abuse for long-term gains from destination visits. Don't repeat former Governor Leavitt's mistake by underestimating the power of the outdoor industry versus the soon-to-be-gone flow oil industry and waning mining industry until it was almost too late. The Outdoor Retailer Trade Show almost relocated outside of Utah because of Leavitt's lack of environmental awareness.	Please see general comment response #18
Julia	Hendrian	Socioeconomics	Without these protections, taxpayers who enjoy the outdoors like myself will refrain from visiting the areas in question. Your Price Field Office, if it doesn't take its stewardship responsibilities for wilderness-quality lands seriously, will have a direct negative impact on the local economy, and thereby tax base, as visitors shun areas leave unprotected to become degraded. The revenues for your area generated by the outdoor-related industry and wildlands visitors will far surpass oil and gas drilling revenues in the long run. 100 years ago oil and gas drilling and mining supported local economies.	The Proposed RMP would preserve, protect and maintain an additional (relative to the current situation) 97,100 acres of wilderness characteristics on lands managed by the Price Field Office. Additionally, the Price Field Offices manages an additional 526,960 acres as Wilderness Study Areas. The BLM is required under FLPMA to manage for multiple-use and sustained yield, and has provided a range of alternatives in its DEIS ranging from a high degree of resource protection to a high degree of commodity extraction, subject to current laws and policies. The Proposed RMP strikes a reasonable balance between resource protection and commodity extraction.
Mary Jean	Hendrie	Minerals and Energy Resources	Instead of striking a balance between protecting wilderness and providing energy development, the agency is planning to sacrifice 98% of wilderness-quality land to oil and gas drilling and development. The BLM insists on tearing up the desert, even though the U.S. Geological Survey estimates that oil and gas deposits under America's Redrock Wilderness would amount to a mere 4 days worth of oil and less than 4 weeks worth of natural gas.	Please see general comment response #101
Mary Jean	Hendrie	Process and Procedures	There is an alternative! The Castle Country Heritage Plan in a balanced alternative that protects lands including America's Redrock Wilderness from oil and gas development. It also includes reasonable opportunities for development to go forward in more appropriate places.	Please see general comment response #35
Paul	Henry	Recreation	Dispersed camping is VERY important to my family and many others. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. Additionally, there is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they	Please see general comment responses #37 and #81

First Name	Last Name	Category	Comment	Response
			impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	
Peter	Henry	Hazardous Materials	I'm rather curious about the low priority given the unauthorized use of explosives to destroy the boulder. In these times of heightened security awareness it would seem that the unauthorized use of explosives to vandalize public property would be of interest to Homeland Security. If it is easy for the perpetrators to obtain explosives for this use, who knows what else they may attempt to blow up? Maybe you should find out. I would also like to know what, if anything, was found out about the illegitimate use of explosives.	The Price RMP provides management prescriptions that allow for multiple use and flexibility while protecting unique resources found in the area. The RMP provides for protection of resources but still provides the flexibility to allow multiple uses within the planning area. Tracking the illegal and uncontrolled use of explosives is beyond the scope of this RMP.
Peter	Henry	OHV Route Identification	I am disturbed that, due to lack of BLM enforcement, vandalism by some ORVers has been allowed to occur on MY land. I realize that ORVers also own the land, and they should have a system of trails set aside for their use, and the allowable areas should be clearly published so responsible ORV users know where they are allowed to go. But they should not be allowed to encroach on wilderness, or roam randomly through the back country. Needless to say, they should not be allowed to vandalize public property, and these actions should be prosecuted as crimes. According to SUWA, they recently received some documents which demonstrate examples of vandalism, including a boulder which was blown up to allow ORV access to a creek near the Hidden Splendor Mine. Other barriers at this and other locations were also demolished. I want the BLM to enforce their current regulations on ORV use, and I want ORV use confined to a definite system of trails.	Please see general comment responses #15 and #19
Ernie	Herrera	Minerals and Energy Resources	I strongly encourage the BLM to adopt a preferred alternative in the Price District RMP regarding oil and gas development which emphasizes economic benefits at the same level as land protection. The Price District RMP will create more government exclusion and limit production of natural gas.	Please see general comment response #18
Glenn	Hershey	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	See general comment responses #19, #20 and #143.
Tausha	Hewlett	Minerals and Energy Resources	Please do not offer our lands to oil companies for any sort of development. These areas should be as pristine and unmarked for my children as they have been for me. Oil is an unrenewable resource. In a few years when the world's oil supplies have been exhausted, I don't want to have seen our land sacrificed. Do not sacrifice the millions of years of beauty found in our deserts for a short time of gratification. Protect our lands for us from future development.	Please see general comment response #18
Tausha	Hewlett	OHV Route Identification	Specific trails are designated where ORV use is appropriate. Marked trails and maps are necessary in helping to maintain the beauty and serenity of the Price area. Please help preserve these lands for future generation.	Please see general comment responses #15 and #19

First Name	Last Name	Category	Comment	Response
Georgette	Hienrich	OHV Route Identification	One problem with the land closures is layering. When one area is closed because of a specific animal, another because of a certain plant, another because of water regulations, another because of history, and so on and so forth, then nearly all of the land ends up closed to the public. Each individual section does not appear very threatening to the people, but when the areas are compiled, it becomes clear that the majority of the land will be taken away. No layering should be allowed. Another concern are the Special Recreational Permits. These are unacceptable as the regulation now stands. It is absurd to require a group of 25 people or 10 vehicles to purchase a permit 180 days in advance of traveling on BLM land. According to these current regulations, just two families going for a weekend four-wheeling ride could exceed the ten vehicle limit... If the SRP regulation is enforced, Carbon and Emery Counties will be dramatically affected financially... The new plan must include an economic impact statement of how this will affect the community. This statement must be designed with the help of, or approved by, the county. Please allow the public to use the public land. No closures should take place until the plan has been further clarified to the public. Proposal A is the only acceptable choice.	See responses to general comments #19, #37, and #81
Jamie	Higbee	Minerals and Energy Resources	I sincerely hope that your decisions with the upcoming RMP acknowledge the importance of coal and natural gas and create policies that maximize environmentally sound and reasonably mitigated energy development. I encourage your agency to consider the importance of energy development not only to our regional economy, but also to our nation's success.	Please see general comment response #18
Bruce	Higgins	OHV Route Identification	The plan would appear to be little better than the existing chaos in the field. The map of this route plan is a hodgepodge of tangled roads that intrude into every Wilderness Study Area and UWC proposed wilderness area in the northern Price district. Proposing to designate every single track in the sand open to motorized vehicles, does not, in my opinion, protect cultural sites, riparian corridors, delicate desert soil, WSAs, and lands within America's Redrock Wilderness.	Please see general comment response #12
Minn	Hill	OHV Route Identification	May I also implore that you designate specific trails where ORV use is appropriate and preserve all other public lands from the noise, soil erosion and scarring caused by ORV's. For everyone's sake, trails are best when they are clearly mapped. The BLM must develop effective enforcement plans to ensure that these lands are protected from now until the end of time.	Please see general comment response #19
Minn	Hill	Wilderness	I ask that you protect citizen wilderness areas such as the San Rafael Swell, Desolation Canyon, Nine Mile Canyon and Muddy Creek. These places are sacred land full of grand treasures of the spirit for everyone. These areas should not be offered to the oil companies for development. We need to preserve areas proposed for wilderness designation. By doing so we are ensuring these natural wonders are not being squandered for short term speculative gain.	Please see general comment response #109
Mira	Hill	Minerals and Energy Resources	As an avid fan of the Redrock wilderness I feel it is necessary to send you this letter in regards to the BLM's decision for gas, oil, and ORV's. I ask that oil, gas, and ORV's to be kept out of areas proposed for wilderness areas and to designate special protection at the source. All natural areas are just as magical as others and all resource areas should be treated equally: riparian habitats, wildlife, cultural resources, non-motorized recreation, fisheries, visual resources, water quality, and air quality.	Please see general comment responses #36 and #101
David	Hiney	Transportation and Access	It is my humble opinion that a great mistake would be made if The Price Resource Management Plan failed to mention the many remote airstrips in the area and protect the ability of aviators to use them for hiking, solitude, environmental protection as a base for exploration and documentation of wilderness, and as the extremely valuable emergency landing sites that they certainly are.	Please see general comment response #21
John	Hirons	Transportation and	By the way the only way for ADA folks to enjoy the back country is by airplane. Keep it Open.	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
		Access	In fact its beneficial to keep it open	
Linda	Hoagland	Minerals and Energy Resources	Excessive restrictions must be revised in order to help facilitate the energy industry response to future needs. Energy demands continue to grow and we are being shortsighted with excessive restrictions to exploration.	Please see general comment response #18
Raymond	Hobbs	OHV Route Identification	The plan will severly limit the ability of elderly and handicapped to access millions of acres. Does the plan consider compliance with the Americans with Disabilities Act? Responsible OHV will not negatively impact the area, and hiking/hikes can do almost as much damage and do occasionally. There are irresponsible people on both sides. Also, have you considered that a majority of the damage occurs from Kids/Young adults out partying and showing off? That damage will not be diminished by taking away the rights of responsible OHV riders, and locking up the trails.	Please see general comment response #80
Chris	Hoefelmeier	Process and Procedures	My hope in writing this letter is to plead with your good conscience to help me preserve what is left of the natural places... Please help protect the future and adopt the Castle Country Heritage Plan. Please help protect BLM lands within America's Redrock Wilderness Act from oil and gas drilling/leasing. Please carefully analyze motorized access and investigate the environmental impact of such roads. Please do not designate "open areas" where ORV use is allowed without limitations; and DO NOT designate any ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness areas.	Please see general comment responses #35 and #36
John	Hoener	OHV Route Identification	Certainly you have seen the same type of ORV damage done by careless individuals as I have. Their tracks from years ago can been seen as clearly as yesterday's. Please analyze your proposed routes more carefully and devise effective ways to keep everyone on designated trails.	Please see general comment response #19
John	Hoener	Wilderness	From my experiences it's almost universally true about not finding trash in existing wilderness area compared to areas where ORV activities are allowed. I can't imagine opening up wilderness study areas to ORV usage until the process is completed. While the slow rate of progress may not be anyone's fault, opening these areas now will only guarantee that much will be lost when a final decision is made. We can't undo the damage, we can't create new wilderness when our values change.	Please see general comment response #144
Joan	Hoffman	OHV Route Identification	I believe that wilderness areas and wilderness study areas and even Utah Wilderness coalition Study Areas for wilderness should not have any proposed or designated travel routes for motorized vehicles. This slaps the face of the wilderness act. It would add to the approx 2500 miles of current roads for ORV that are not in wilderness quality lands.	Please see general comment responses #12 and #36
T.W.	Hoffman	Process and Procedures	WE URGE you support the Castle County Heritage Plan--the citizen's alternative which offers a solid balance between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Howard	Holt	Process and Procedures	On behalf of the children of all life and the next seven generations, I ask that you replace your draft plan with one that fully protects the redrock canyons and uphold America's Redrock Wilderness Act.	Please see general comment response #36
Aurelia	Honerkamp-Smith	Process and Procedures	I am writing to protest the Price Resource Management Plan draft alternatives. Please protect America's Redrock Wilderness! This beautiful landscape is a treasure that belongs to all American people, and it would be a tragedy if it were destroyed. It is not worthwhile to permanently destroy this area in return for a small amount of gas.	Please see general comment response #36
Daniel	Hooley	Process and Procedures	Adopt the Castle Country Heritage plan rather than the Price Resource Management Plan draft alternatives.	Please see general comment response #35
Larry	Hopkins	OHV Route Identification	I am upset that your alternates do not state what will be closed and what will be open- what is up with that?? How about real information for us to comment on.	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
Larry	Hopkins	OHV Route Identification	I do not understand why the chimney rock summerhouse system is not shown as open in your preferred option. This is not acceptable if this great area is closed under your alternative. I have a very hard time following your plan because of the many different layers that it seems to have. Please redefine what is open and what is closed so one can comment on it and understand it with out the multilayer. I beg you to keep all trails open that are currently open to motorized.	Please see general comment responses #20 and #37
Larry	Hopkins	OHV Route Identification	In past years we have ridden as a club group of 25-35 riders-I under stand that with the new rules this would be outlawed. Why? When one rides in a group the leaders have a chance to educate the riders as to the importance of staying on the trail-slowing down or stopping when meeting other users and the importance of traveling slowly when in dusty conditions. As I understand it your new rules will stop this behavior which I think is important. EDUCATION IS VITAL.	Please see general comment response #81
Larry	Hopkins	Transportation and Access	I am avid off road single track motorcycle rider who volunteers locally for trail maintenance-writing grants and trying to keep what we have open-signed and patrolled so that we do not loose any more trails. We have already lost 80% of what we had 15 years ago. local officials tell us to go ride in Utah. But if the current trend continues then we will be riding in designated boxes-sacrifice areas in Utah.	Please see general comment response #10
Catherine	Horton	OHV Route Identification	I'd request that you preserve the wilderness characteristics of the areas you represent from off-road vehicles. I would urge you to a)restrict ORV to designated roads and trails throughout the entire state, b) facilitate enforcement with a "closed until posted open" policy, c) confirm that all routes serve some identifiable and compelling purpose, d)establish adequate opportunity for both motorized and non-motorized recreation, avoiding conflicts between these two groups, e) close ecologically damaging routes such as those through riparian areas and f) reduce noise pollution by placing off-road vehicle trails away from non-motorized recreation areas.	Please see general comment response #19
Alison Heron	Hruby	Minerals and Energy Resources	I am asking you to look elsewhere for natural gas and oil so that we may hold onto that which goes beyond our need for material comforts.	Please see general comment response #18
Philip	Hubbard	Wilderness	I urge the BLM to protect the wilderness areas overseen by the Price Field Office from the damage produced by off-road vehicles. Please allow no designated vehicle routes within Wilderness Study Areas and other lands covered by the proposed America's Redrock Wilderness Act. I also urge the BLM to protect all areas covered by America's Redrock Wilderness Act from oil and natural gas drilling. Drilling in these areas would have a negligible impact on America's energy needs, but the drilling likely would cause irreparable damage to one of our country's most unique natural treasures.	Please see general comment response #111
Patrick	Huber	Minerals and Energy Resources	the plan is skewed heavily towards the sacrifice of our public lands to the narrow special interests of oil and gas production and ORV use.	Please see general comment response #18
Patrick	Huber	OHV Route Identification	No ORV use should be allowed in lands that are found in the America's Redrock Wilderness Act. No new trails should be established in the RMP (such as that to the top of the Book Cliffs).	Please see general comment response #12
Rainer	Huck	OHV Route Identification	The travel plan designations of the Price River Draft RMP are so biased and flawed that no comments other than a request for withdrawal are possible. The authors of this plan are the same as for the 2003 San Rafael Travel Designations... This Plan, in exactly the same way as its doomed predecessor, explicitly ignores RS2477 right of way owned by the Counties and the State of Utah... Much of the land under the management of the Price River Office is currently designated as "Open", which allows unconfined travel. This has been the traditional designation for BLM land not reserved for special use. It has served the public well. Any claim of "damage" by vehicle travel to these lands is exaggerated and designed to provide a pretext for the draconian actions envisioned by this plan.. The shift from "open" status to "designated routes" is enormous... The envisioned travel designations of this new	Please see general comment responses #15 and #19

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			plan are just as bad, just as unmanageable, and they will be just as unenforceable.	
William	Huggins	Minerals and Energy Resources	Two issues in particular concern to me. The first is that 98% of the wilderness quality lands in the Price area will be open to oil and gas drilling. I again urge you to protect all areas within the America's Redrock Wilderness Act from oil and gas leasing.	Please see general comment response #101
William	Huggins	Minerals and Energy Resources	I do not believe we should sacrifice our natural heritage for short term energy gain. Especially when the energy industry is sitting on unused leases all across the West.	Please see general comment response #18
William	Huggins	OHV Route Identification	The second issue is the highly contentious off-road vehicle mess. Sids Mountain is a perfect example. That area should be closed to all motorized access.	Please see general comment response #19
William	Huggins	OHV Route Identification	I would like to see that off-road vehicle trails be designated outside of citizen proposed wilderness areas. All proposed wilderness areas should be closed to motorized traffic, period.	Please see general comment response #12
James	Hughes	OHV Route Identification	I support the Castle County Heritage Plane effort to limit ORV use, it leaves thousands of miles of designated ORV trails and protects more of the wild places for the future. I have visited many of the areas in question - Desolation Canyon, Nine Mile Canyon, San Rafael Reef... and encourage you to support foot traffic only in these places. All the land designated in the America's Redrock Wilderness Act should be protected until a final determination is made by Congress.	Please see general comment response #12 and #35
James	Hughes	Wilderness	I am writing in regard to the proposed Price Resource Management Plan. I am a native of Utah, and have been returning to visit the southern canyons over the last 40 years - never ceasing to be amazed at the beauty and vastness of the wilderness quality there. I have traveled the world over and still attest that Southern Utah is the most beautiful place in the world. As time goes on and population increases, wild places will become increasingly rare and valuable. Imagine the value of large tracts of wilderness 500 years from now.	Please see general comment response #109
William	Hughes	OHV Route Identification	The San Rafael Travel Plan, just recently completed, seems to be open to changes already. I read the FAQs posted on your website, and they seem to indicate that changes in this plan are not anticipated, but the fact that this is unclear in the draft plan highlight a part of the confusion I have alluded to. I definitely do not support any additional road closures in that area, there were already too many with the implementation of that plan... The final travel plan seemed like a slap in his face with its extensive closures. Additional closures beyond those already implemented in the plan would be really excessive. More confusion arises concerning routes affected by differing management alternatives. The Chimney Rock/Summerville trail systems are mentioned in the preferred alternative, but they aren't shown on any of the plan's maps. In addition to these trail system, the Humbug trail system should be kept open, and links should be designated to the Arapeen trail system.	Some of the routes mentioned in the text of the Draft RMP/EIS were inadvertently left off of the preferred alternative map. With the exception of Alternative E, all of the alternatives analyzed in detail would not change the San Rafael Route Designation Plan. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives. Table 2-15 of the Proposed RMP/Final EIS indicates that under the Proposed RMP the Summerville/Chimney Rock Trail System/Arapeen Trails System would be open. See general comment responses #19, #20 and #31
William	Hughes	OHV Route Identification	The group size limits proposed in the plan are too restrictive. The fact that there is no differentiation between non profit and for profit groups in these limits concerns me. The not for profit groups tend to be clubs that enjoy recreating together. These clubs are the source of labor for BLM volunteer programs, as well as a major player in the effort to promote positive user ethics. Placing tighter limits on these groups appears to be counter productive to me. Leave the not for profit group size limits at the established 50 vehicle group size limit.	Please see general comment response #81
William	Hughes	Process and Procedures	I understand the layered concept in managing areas, but this plan seems to take the concept to a level that it becomes very confusing. It seems like the multiple layers in this plan tend to confuse the issues rather than clarify	Please see general comment response #37

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			them. Examining the various alternatives, the specific layers involved and their affect upon OHV use become very unclear. Not only are the layers involved unclear, their boundaries are unclear as well. I think some corrections need to be done here for the public to be able to make intelligent, useful comments on the plan.	
William	Hughes	Recreation	A related item to the one above is the dispersed camping sites. The alternatives presented in this plan do not clearly lay out the sites each of the alternatives would leave open. Overall, dispersed camping doesn't seem to be a problem now, and little is mentioned in the draft plan to explain the need for additional restrictions. These issues on camping should be addressed prior to the finalized plan.	Please see general comment response #81
Chrys	Hulbert	OHV Route Identification	Please designate off-road vehicle trails outside of citizen proposed wilderness areas. Designate these citizen proposed wilderness areas as semi-primitive non-motorized to protect them as such.	Please see general comment response #12
Elaine	Hummer	Minerals and Energy Resources	Allowing oil and gas leasing, drilling, and development would do horrendous damage to this fragile and unique environment.	Please see general comment response #18
Elaine	Hummer	OHV Route Identification	I've hiked in some of the Utah wilderness areas. I've seen the damage and heard the noise caused by ATV's and Dirt Bikes. exercising little control over ATV's and Dirt bikes would do horrendous damage to this fragile and unique environment	Please see general comment response #19
Dan	Humphreys	Cultural Resources	The main reason that I am writing this letter is due to the fact that I was recently informed by a member and campaigner of the Mission for the Southern Utah Wilderness Alliance, that a large majority of the wildland in Utah may become industrialized. I understand that part of the land under the BLM is Nine-Mile Canyon. I also understand that this area is in threat of becoming more industrialized. I think that this is such a shame. Nine-Mile Canyon is a part of Utah history. If it were to be destroyed for the sake of oil or natural gas, it could never be reclaimed. I feel strongly that we need to take preventative action on this matter so that we do have natural majestic history and to enjoy in the future. I hope that you will take my thoughts and views into consideration.	Please see general comment responses #9 and #36
Jodie	Hunt	Minerals and Energy Resources	Protect all areas within America's Redrock Wilderness Act from oil and gas drilling and leasing... Designate ORV trails outside of wilderness areas.	Please see general comment responses #36 and #101
Rob	Hunter	Transportation and Access	I am writing to express my thanks for including Mexican Mountain, Cedar Mountain, Hidden Splendor and Peters Point in the RMP. I have visited each of those airstrips with my friends and family in my small airplane and hope that I will be allowed to do so for many more years. I have enjoyed hiking, camping and backpacking and canyoneering once on the ground at these locations. I have infant twin sons that I plan on bringing there soon. In addition I hope you will consider adding the other backcountry airstrips in the RMP area to the plan to give them the same recognition as the fist four you have named. Of the several others the only other one I have been to so far is Horseshoe Canyon. I hope to have a chance to visit Sagebrush Bench, Cliffdweller Flat, Gruvers Mesa, Sweetwater Reef, Temple Wash and Sagebrush Bench in the future. If you need Information about the location of any of these airstrips I'd be glad to provide it. I have never found any trash or damage to those areas caused by airplanes or pilots but have collected trash that I have found left behind by a backpacker at Mexican Mountain and I hauled it away in my airplane. I was able to identify the source of the litter by calling up the number on a pill bottle that was left behind with the other trash. I think pilots are good stewards of the land and hope they will be allowed to continue to use all the airstrips in the	Please see general comment response #21

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			RMP area.	
Dickson	Huntington	Livestock Grazing	Probably the most significant proposed change in grazing administration and the most problematic is the proposal of relinquishing grazing permits when requested by the permittee, and then these permits could be allocated to other uses, including wildlife.	The voluntary criteria contained in the Draft RMP/EIS have been changed in the Proposed RMP/Final EIS to be consistent with BLM policy. The policy is detailed in "livestock grazing" under Table 2-14. See general comment response #82.
Dickson	Huntington	OHV Route Identification	The RMP draft incorporates the San Rafael Motorized Route Designation Plan (MRDP). Permittees support the plan as implemented in 2003; however, it is our position that there is not strict enforcement of the plan; and resource damage is resulting from violators of the plan.	BLM has entered into an agreement with the Emery County Sheriff to assist with enforcing the MRDP. The agreement provides for a full time Emery County Deputy to patrol BLM lands in Emery County including enforcement of the San Rafael Route Designation Plan. Also see general comment response #15.
Dickson	Huntington	Wild Horses and Burros	Wild Horses and Burros - most permittees recognize that some herd management (HMA's) need to be maintained for wild horses in order to conform to the Wild Horse and Burro Act of 1971. We therefore recommend that wild horse HMA's be kept strictly within the numbers as indicated in the no-action alterative and that the Sinbad allocation not be transferred to the Muddy Creek allotment as proposed in Alternative D.	Maintaining wild horse and burro populations at the AML is accomplished through periodic gathers as directed by law and regulation. BLM actively implements gathers to maintain wild horse and burro populations at approved AML. Implementation of gathers is governed nationally, based on the number of horses in the wild horse system. Individual Field Offices can plan for removals, but actual removals are approved by the Washington Office before herds can be reduced. Consolidation of the Muddy Creek HMA with the portion of the Sinbad HMA that has horses in it would not increase the number of wild horses in the area, but would simply redraw the boundaries to more accurately reflect wild horse population interactions.
Dickson	Huntington	Wildlife and Fish	Sheep Grazing (2-41) - We believe a 9-mile buffer zone from domestic sheep to habitat occupied by Big Horn sheep is excessive. Change in classification from cattle to sheep is rare but should not be prohibited by a 9-mile buffer zone, especially when no proof of disease cross-over has been proven. No acceptable alternatives are offered. 3. Wildlife - We believe reintroduction or increase big game populations by Utah Department of Wildlife Resources (UDWR) not be supported by BLM on the Resource Management Plan unless DWR acquires additional forage or habitat and be allowed only when it does not interfere with livestock forage allocations. Grazers support Alternative A.	See general comment response #98. North American native wild sheep are vulnerable to a variety of diseases and parasites carried by livestock, particularly domestic sheep. There are numerous documented cases of native wild sheep interacting with domestic sheep which have resulted in harmful consequences to the wild sheep populations. There is consensus among both wild and domestic sheep specialists that the most effective tool for minimizing disease problems is to keep them physically separated. In BLM's "Revised Guidelines for Domestic Sheep and Goat

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				Management in Native Wild Sheep Habitats" a buffer of 9 miles was recommended. On page 2-42 of the Draft RMP/EIS BLM would consider providing forage to UDWR to support increased populations if UDWR acquires additional habitat or forage.
Darrin	Hurdsman	Process and Procedures	I am in opposition to the DRMP. We do not need these additional layers of bureaucracy put into place. We need to change the way we are trying to preserve the land from the people, and preserve it for the people.	Please see general comment response #37
Ethan	Hurdsman	OHV Route Identification	I feel that the desert should be open to OHV use. 78 % of Utah is already locked up, why lock up more of it? Utah already has more National parks than any other state and the only way to enjoy that is by walking. Why lock up more of it that you are unable to enjoy? " Some people will use the argument about the impact that OHV's have on the environment (erosion), you need to ask your self what made that place the way it is? Answer... erosion. I know that there are few trails that are open still, but that gets old quick and there is a lot more out there to enjoy than just that. There are things out there that I want to show my children when they grow up and we wouldn't be able to see all of that just by walking.	Please see general comment response #19
Ethan	Hurdsman	OHV Route Identification	One other thing that I have not heard or read about is how a person with a handicap disability is able to access this land if you're going to let people be able to go in there period. You must provide a way for this group of people to have the same rights as the people that are able to walk in there. Locking up the land will also have a great impact on the local business's that either sell OHV's or rent them because why would you want to buy or rent something you can't go out and use.	Please see general comment responses #19, #80 and #81
Laurie	Hurdsman	Transportation and Access	Public access to public lands is being taken away at an alarming rate and we need to stop this injustice from occurring any. The answers to our problems are not to lock up the land from the people, it is to involve people in caring for the land.	Please see general comment response #10
Brian	Hurst	Livestock Grazing	Allow ranchers more grazing permits; they have done more for managing the land and keeping spring and creeks flowing.	Please see general comment response #33
Brian	Hurst	OHV Route Identification	What I propose: 1. Keep open the trails that allow people to come and see and enjoy the beauties this land has to offer. 2. Look to expand the trail system in areas that do not link areas. 3. Work with the different clubs to manage and up keep the trails.	Please see general comment response #19
Brian	Hurst	Wilderness	In Utah as a whole I believe that the people would like to see the land protected and wild life habitat preserved, If you look at the amount of National Parks and wilderness that the state of Utah has you will find that we have more protected land than half the eastern states combined. If the push to have our lands shut down is coming from the east then have them sell their land and turn it into a monument or wilderness or some kind of other non use land because there is not one square inch of land in this country that could not be classified as Unique land structure or some other definition you may use to close out land. From as westerner going East their land is just as fascinating to me as our land is to them.	Please see general comment responses #1 and #36
Gina	Iannelli	Minerals and Energy Resources	You really owe it to the next generations not to give in to the immediate gratification of drilling for oil and gas that won't provide for more than a few months worth of energy.	Please see general comment response #18
Gina	Iannelli	OHV Route Identification	Use of ORVs have already damaged the area beyond repair and have caused serious degradation. This draft does not allow for a balance - the wants of a minority are being considered over the wants of the majority who	Please see general comment response #19

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			use this land the way it was meant to be used and enjoyed. Opening up 98% is not a fair balance. You would be doing a huge disservice to those who have not yet had a chance to see this beautiful country without it being further irreparably harmed.	
Gina	Iannelli	Process and Procedures	Please protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon. In addition, please support the balanced alternative, the Castle Country Heritage Proposal, that the Southern Utah Wilderness Coalition has submitted to you. It protects wilderness-quality lands and other sensitive areas from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable transportation plan that lessens the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. Give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands and it will be a legacy for a beautiful state.	Please see general comment responses #35 and #36
Carol	Incremona	Wilderness	Wilderness designation and protection are vital if we are to accurately weigh long-term nondestructive use, enjoyment, and responsible multigenerational stewardship against short-term destructive commercial and recreational interests. -Oil and gas extraction in wilderness areas provides only short-term profits for only a few people but causes long-term damage that prevents many people from nondestructive enjoyment of these areas. -RS 2477 road designation and road building prevent multigenerational stewardship. If hikers in national parks such as Yosemite are asked to stay on trails because even a few footprints can cause damage in sensitive areas, how can we consider centuries-long damage from roads that would be built to facilitate short-term commercial interests such as drilling or mining and short-term recreational interests such as widespread, extensive, destructive use of off-road vehicles? For a year I lived in Utah and was able to visit such places as Antelope Island State Park, Bryce and Zion national parks, and Timpanogos Cave National Monument. I still have a picture of Mirror Lake on my wall. I must do my part to protect the many beautiful, fragile, invaluable bodies of water here in Minnesota from short-sighted, short-term pollution. In turn, I ask and urge you to protect the wilderness areas in Utah, and specifically the red rock canyonlands, for all of us now and for all the generations to come.	Please see general comment response #109
Bill	Ingalls	Process and Procedures	I would have hoped and trusted that your agency would reach a reasonable balance between wilderness protection, energy development, and off road access in its revised resource management plan. If 98 of the remaining wilderness quality lands in your district are "open" to development, what kind of a "balance" are we talking about? 80 of the lands managed by the Price Field Office are within one mile of a motorized route. Yet far too much land is left open to unregulated ATV and dirt bike abuse. Where are the provisions to protect places like the Upper Desolation Canyon, Nine Mile Canyon, and the Price River from gas and oil development and leasing? And to protect the San Rafael Swell, Sids Mountain and Muddy Creek from the destruction of ORV use? My family and I strongly urge your District Office to protect all the areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. Not to designate ORV trails within ARWA, or existing wilderness study areas. Or "open" areas where ORV use is allowed without limitation.	Please see general comment response #36
Libby	Ingalls	Minerals and Energy Resources	Protect areas with wilderness characteristics. Please do not permit oil and gas exploration, mining, off-road vehicle abuse, or any other activity that would harm the land and diminish wilderness characteristics of the mountains, canyons, washes, and beautiful natural areas.	Please see general comment response #101
Libby	Ingalls	OHV Route	Protect areas with wilderness characteristics. Please do not permit oil and gas exploration, mining, off-road vehicle abuse, or any other activity that would harm the land and diminish wilderness characteristics of the	Please see general comment response #12

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		Identification	mountains, canyons, washes, and beautiful natural areas.	
Joe	Iriart	OHV Route Identification	Being a senior citizen who has enjoyed many years in this part of the country I would like to express my concerns about the limited access given to seniors as well as disabled and others who for one reason or another can not access a lot of these scenic views. Are we going to deny this to our disabled Veterans as well? This will only leave access to the well bodied and elite in this country for their selfish needs. I hope not. As long as people are responsible I feel they should be afforded the right now view these extraordinary sites.	Please see general comment response #80
John	Isaacs	OHV Route Identification	It designates 3,500 miles of motorized routes even though they cross wilderness study areas, citizen wilderness study areas, riparian zones, and cultural heritage areas. If these routes are designated 80% of the land will be within 1 mile of a road. There will be few areas for quiet and for non-motorized recreation.	Please see general comment response #19
Jill	Isan	OHV Route Identification	The citizens, however, are not the only ones who will be affected; the economy will also be damaged by this regulation... With the new restrictions, the people who own these vehicles will be less likely to use them. This will lead to fewer tax dollars and jobs. The revenue from ATV and 4x4 purchases in vehicles, gear, parts and gas is a boom to the economy that we cannot afford to lose. However, this money will decrease if the regulation ordering Special Recreational Permits is allowed to remain in place. A complete economic impact statement must be drawn up and approved by the County. Please assure that the rights and lifestyles of the citizens are protected. Do not allow organized clubs to be disbanded when they are so often the ones who respect the land and educate others to do so as well. Do not allow families to be prohibited from traveling together. The Special Recreational lifestyles of the people who live here and appreciate the land. Proposal A is the only possible solution until the plan can be further clarified for the public. Do not allow layering (plan on top of plan to close land for this purpose of that) to take place. Please keep our land open and intervene for the benefit of the citizens.	Please see general comment response #19, #37 and #132
Jeremiah	Isom	OHV Route Identification	The BLM recently passed a regulation that is both shocking and damaging to the community. Much of the work behind this went on without the knowledge of the public. Community members involved with committees on land issues were not informed of the changes until after the law had been passed. Even now, only year old information about it can be found on the BLM website. The BLM was able to pass this without seeking the approval of the public. to whom, exactly, is the BLM accountable? The regulation to which I refer restricts the freedoms of persons wishing to travel for recreational purposes. Any group over 10 vehicles or 25 persons traveling across BLM land must purchase a Special Recreational Permit. This includes family reunions, church organizations, recreational clubs, and family and friend outings. In some cases, just one or two families out for a weekend could exceed the regulations. Every truck, ATV, camping trailer, or hauling trailer counts as a vehicle. The families wishing to pass through BLM land would have to know exactly where they would be camping or traveling, what day they would arrive and leave, what they were planning to do for sanitation and garbage disposal purposes, and the license and insurance of every driver and vehicle going. And they would have to know and submit all of this at least 180 days in advance. True, there is wisdom in some of these requirements. People should be responsible for properly disposing of their garbage and sanitary waste; and people should not be allowed to drive off road where they can tear of the land . However, the new regulations make it virtually impossible for families to go out together. Rarely does a group of family and friends plan a local outing on the desert six months in advance, nor do they know exactly who will come and which vehicles they will bring. The $80 fee and the required group insurance will discourage many groups from venturing into their own backyards to play. In fact, as the regulation stands now, no one has an SRP; therefore, it is illegal for groups to travel on BLM land for a period of six months. The regulation was put in force as of June 1, 2004, and the public was not informed of the requirement 180 in advance. Why weren't the people informed about this regulation before it went into place? Why does the BLM have so much power? To whom is the BLM accountable? The BLM workers are not elected	Please see general comment response #81

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			officials. The public does not have any say in who determines the laws that affect their own local land. The BLM does not have to report to anyone to approve their regulations. Please help the citizens by stopping the Special Recreation Permits from remaining in place and make the BLM officials accountable to the public. Until the public can learn more about this plan, the only possible option is Proposal A.	
Laura	Jacobs	Minerals and Energy Resources	Perhaps instead of continued drilling and destroying wild land we could encourage alternative fuels and energy saving vehicles and appliances.	Please see general comment response #18
Scott	Jacobson	OHV Route Identification	Trail Development - Safety in expanding Connecting or Looped trail Systems - Areas Now Closed. The “Purple Trail” should be reopened as it provides a connecting loop into the lower colored trail systems. Having that loop closed forces riders to go back the way they came (causing risk in traffic from the other direction and additional wear on the trail) or forces them through part of FMOH (Five Miles of Hell) which requires a higher level of riding ability. Having both these open would disperse overall usage to a wider area elevating pressure in high use areas.	The problems identified in the comment have not generally been demonstrated or documented as an issue for resolution through the preparation of the Price RMP. The San Rafael Motorized Route Designation Plan (2003), is incorporated by reference into the Proposed RMP/Final EIS and with the exception of Alternative E would not be changed under any of the alternatives analyzed in detail. Impacts of OHV use on other resources and uses are addressed in Chapter 4 of the Proposed RMP/Final EIS.
Scott	Jacobson	OHV Route Identification	Temple Mountain - ATV Designation: Perhaps coming as a surprise to other OHV club members to which I belong, I agree that the Orange, Blue and Green (and Purple) trail systems should remain designated as single track use only. I’ve seen the disastrous results both here in Utah, California, Colorado, Idaho and Arizona when single track systems have been opened to ATV (52") use. There are trail systems suited for their use, and colored trail system is not one of them.	Please see general comment response #20
Scott	Jacobson	OHV Route Identification	The preferred alternative plan shows no trail systems. If there is no Route Designation Plan, many existing motorized routes could be lost in the shuffle and at the discretion of the BLM in the rush to finalize the RMP/DEIS inadvertently or not, the BLM Price Field Office must admit their history of keeping track of well documented trail system routes and roads via maps submitted to them from the public is abysmal). Until a clear inventory can be established and because of this record keeping, I would ask that all the roads closed by the San Rafael Route Designation Plan of February 2003, and which Emery County has filed RS-2477 claims upon, be re-opened... 3.Trail Development - Safety in expanding Connecting or Looped trail Systems - Areas Now Closed. The "Purple Trail" should be reopened as it provides a connecting loop into the lower colored trail systems. Having that loop closed forces riders to go back the way they came (causing risk in traffic from the other direction and additional wear on the trail) or forces them through part of FMOH (Five Miles of Hell) which requires a higher level of riding ability. Looped systems in the California "Kennedy Meadows" riding area has provided safer trails and helped in managing an even distribution of wear and tear on the trail. The Copper Globe is another area that should have a loop integrated into the route. Having both these open would disperse overall usage to a wider area alleviating pressure in high use areas.	Please see general comment response #19
Scott	Jacobson	Recreation	Dispersed camping can not be managed by your agency. Why? You’ll never have the ability to hire staff to enforce it and if you did, would find it unenforceable by the definitions you’ve set as guidelines.	Please see general comment response #94
Scott	Jacobson	Recreation	Dispersed Camping and Group Camping Permits. Dispersed Camping can not be managed by your agency. Why? You'll never have the ability to hire staff to enforce it and if you did, would find it enforceable by the definitions you've set as guidelines...	Please see general comment responses #94 and #147

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Scott	Jacobson	Transportation and Access	The Preferred Alternative plan shows no trail systems. If there is no Route Designation Plan, many existing motorized routes could be lost in the shuffle and at the discretion of the BLM in the rush to finalize the RMP/DEIS (Inadvertently or not, the BLM Price Field Office must admit their history of keeping track of well documented trail system routes and roads via maps submitted to them from the public is abysmal). Until a clear inventory can be established and because of this record keeping, I would ask the all roads closed by the San Rafael Route Designation Plan of February 2003, and which Emery County has filed RS-2477 claims upon, be re-opened. This includes, but not limited to the following; Copper Globe, Devil's Canyon, June's Bottom, Link Flat, Picture Flat to Miller's Canyon, Red Hole Draw, Seger's Hole, Short Canyon and two roads closed in the 1991 Resource Management Plan, Mexican Mountain and Swasey's Leap, and the Purple Trail.	Please see general comment response #39
Scott	Jacobson	Wild and Scenic Rivers	Though water can be seen in "Coal Wash" area (North and South) from time to time, they are primarily dry. Please don't attempt to designate a dry wash as a river. If you do, it will undoubtedly create more issues than you are prepared to handle by unnecessary bringing instability to this "Conditional Use" area. Don't mess with one of your success stories.	Please see general comment response #88
Scott	Jacobson	Wild and Scenic Rivers	Please don't attempt to designate a dry wash as a river. If you do, it will undoubtedly create more issues than you are prepared to handle by unnecessary bringing instability to this "Conditional Use" area. Don't mess with one of your success stories.	Please see general comment response #88
Daniel and Emily	Jameson and Aversa	OHV Route Identification	In the matter of Off-Road Vehicle permits, we ask you to fully analyze each route to make sure that environmental impact is minimized. Please do not designate "open areas" for unconstrained ORV use. Please do not designate ORV trails on lands within the Redrock Wilderness Act or in existing wilderness study areas like Sids Mountain, Mexican Mountain, Eagle Canyon, Muddy Creek, Desolation Canyon, the San Rafael Reef, and Labyrinth Canyon.	Please see general comment response #12
Daniel and Emily	Jameson and Aversa	Process and Procedures	We urge you to adopt the Castle Country Heritage Plan which will help to safeguard essential canyon habitats from oil and gas leasing...we would like to see all areas within the Redrock Wilderness Act protected from such incursions.	Please see general comment responses #35 and #36
Chuck	Jarecki	Transportation and Access	For the past several years my wife and I have flown our Cessna 180 from our home in northwest Montana to the Mexican Mountain airstrip for several days of camping, hiking and simply enjoying the area. During each visit there are usually several parties of day hikers or backpackers that come though the airstrip area. Almost without exception they are respectful of our method of access into the area, and some are fascinated by the idea of airplane camping. My wife and I are past age 65 and could not be in this beautiful area of Utah without the use of our plane. The airstrips are already there and provide a low impact method of accessing the back country. We commend you for proposing the continued use of four of the airstrips in the RMA, Mexican Mountain, Hidden Splendor, Cedar Mountain, and Peter's Point. We urge you to allow the continued infrequent use of the remainder of the airstrips in the area. In the years ahead we would like to explore other areas to which we can fly.	Please see general comment responses #21 and #80
Chad	Jensen	Minerals and Energy Resources	I appreciate the opportunity to register my support for the development of oil and gas on the Price BLM RMP. I support alternative D, but believe it could be expanded to be less restrictive regarding multiple-use and energy development. I would also request the President's Energy Plan, Executive Order 13212, and Federal Reserve Chairman Greenspan's most recent comments in support of natural gas exploration be considered during	Please see general comment response #18

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			deliberations on the new RMP EIS document.	
Clark	Jensen	OHV Route Identification	I believe that enforcing the existing rules regarding off trail riding is the best policy, not the closure of some or all of the trails.	Please see general comment response #19
Clark	Jensen	Transportation and Access	I would like the BLM to maintain access to the public lands. I feel that public lands without access are a waste as they would only be enjoyed by a select "privileged" few. Motorized travel is exceptionally important to me as I find I am able to enjoy the beauty of the great outdoors without investing weeks in hiking to get to one spot.	Please see general comment response #10
Clark	Jensen	Transportation and Access	To illustrate my point, last spring we took our ATVs on a trip with my family of 6, my brothers family of 3 my cousins family of 7. All together there were 5 adults and 11 children ranging from 3-16 years old. The trail was an approved trail that started out as a logging or mining trail and we left no trace or evidence we had ever been on the trail. This opportunity to introduce the beauties of Utah would not have been possible without motorized vehicles. Please do not take away our ability to enjoy the great outdoors.	Please see general comment response #10 and #81
G. Kim	Jensen	Recreation	I am writing as a concerned and responsible off road enthusiast. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with. Thank you for considering this comment	Please see general comment responses #37 and #81
Glen	Jensen	Livestock Grazing	I have a concern about grazing permits that come up for sale and are being bought up by DWR and other sports groups. It is illegal to use grazing allotments for anything other than grazing. If I were found to not be using my allotments for grazing I would lose my permits, shouldn't it be the same for The DWR and these other sporting groups. I also have a concern over wildlife use on our grazing permits. The BLM pursues cases of illegal livestock grazing and holds ranchers responsible, yet in years of drought when the BLM asks us to reduce the use of our permits we comply. However the wildlife continues to use the improvements we have made upon the land benefiting from improved ponds and water. I feel as though we work for the betterment of the land and work with the BLM in various conditions, I feel that the BLM should also work with ranchers on this RMP as well.	Please see general comment responses #83 and #145
Glen	Jensen	Livestock Grazing	I have a concern over the allotments that I have next to the Cleveland Lloyd Dinosaur Quarry. If the RMP calls for expanding recreation allotments here it can only come from grazing allotments. I am against this. Also what will this increased recreation activity do to surrounding land allotted to grazing?	Please see general comment response #100
Glen	Jensen	OHV Route Identification	I have another concern about off road vehicles and the damage they are causing to both public and private land. When these off road vehicles go off road they are going anywhere they want causing terrible damage to the land. I believe that when these irresponsible off roaders damage the land they should pay to have the land repaired. I believe that organized trails should be built and that the off roaders should stick to these trails.	Please see general comment response #19
Kirk	Jensen	Livestock Grazing	Many of the ponds and existing vegetation are directly the result of the livestock permittees. If not for the permittees improvements on the ponds and springs on these allotments it would not support either the livestock or wildlife. Much of the cost of these improvements is borne solely by the permittee, not taxpayer money. To make any improvements on these allotments it takes the BLM more than two years for any studies and/or	BLM policy requires the maintenance of structural range improvements use by the livestock permittee to be maintained by the permittee. These projects often are used by wildlife and depending on the circumstance maintenance may be fully or partially

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			paperwork to be finished before any improvements can be made. This time should be shortened, it should not take that long to do your studies.	funded through the BLM or other wildlife interests. The DEIS proposes to continue livestock grazing on most of the existing allotments and the permittees will continue to be responsible for maintenance as they currently are under cooperative agreements. For those few areas not grazed by livestock, that have range improvements, the BLM or other interested parties would be responsible for maintenance so that the beneficial impacts of these projects continue into the future. Shortening the time to comply with law, regulation and policy in completing studies and implementing range improvements are not RMP decisions.
Kirk	Jensen	Livestock Grazing	Another comment I would like to make is eliminating the spring grazing from May 15th to June 15th to protect Antelope.(Section 2-41, Alternative C). I am against this alternative. Livestock presence during the fawning season tends to give the newborn Antelope protection from the coyotes and other natural predators. Livestock grazing improves the browse and forbe production.	Please see general comment response #104
Kirk	Jensen	Livestock Grazing	Another concern I have with the RMP is the Cleveland Lloyd Dinosaur Quarry (Section 4-334, Alternative C). I am also against this alternative, and anything that diminishes livestock grazing. If they expand acres on the quarry for more recreation use what effect will that have on the surrounding grazing allotments. Will this eliminate the grazing allotments?	Please see general comment response #100
Kirk	Jensen	OHV Route Identification	I would also like to comment on OHV use on the Humbug allotment and the Lucky Lemon Flat allotment. There is a place for OHV use in organized trails, not the disorganized mess that has new trails tearing up and destroying the land wherever they go.	Please see general comment response #20
Kirt	Jensen	Minerals and Energy Resources	The Government has been promoting the use of natural gas as a clean fuel alternative, but exploration and development of natural gas on public lands is being tied up because of over regulation and permitting issues on public lands.... I have reviewed the draft RMP and believe the document is too restrictive regarding oil and gas development... For these reasons I request the Forest Service develop an expanded alternative D with expanded natural gas development provisions on the Price BLM RMP.	Please see general comment response #18
Emily	Jenson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Konnor	Jenson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Shelly	Jenson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you	Please see general comment response #12

First Name	Last Name	Category	Comment	Response
			and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	
Terry	Jetter	OHV Route Identification	I would like to let you know how much we love living in a state that has so much beautiful land to enjoy - high mountains to deserts. I hope that the BLM will continue to keep the unique Utah wilderness a place that current and future generations will enjoy. We recently hiked a wonderful and well marked trail to Corona Arch outside of Moab. I hope that when we drive to that trail head in the future we won't see oil drilling rigs along the highway. Another concern is the use of ORV's. If I had my way all ORV's would be banned from all trails. Please limit their use in the wilderness areas.	Please see general comment response #19
N	Jewkes	OHV Route Identification	One problem with the land closures is layering. When one area is closed because of a specific animal, another because of a certain plant, another because of water regulations, another because of history, and so on and so forth, then nearly all of the land ends up closed to the public. Each individual section does not appear very threatening to the people, but when the areas are compiled, it becomes clear that the majority of the land will be taken away. No layering should be allowed. Another concern are the Special Recreational Permits. These are unacceptable as the regulation now stands. It is absurd to require a group of 25 people or 10 vehicles to purchase a permit 180 days in advance of traveling on BLM land. According to these current regulations, just two families going for a weekend four-wheeling ride could exceed the ten vehicle limit... If the SRP regulation is enforced, Carbon and Emery Counties will be dramatically affected financially... The new plan must include an economic impact statement of how this will affect the community. This statement must be designed with the help of, or approved by, the county. Please allow the public to use the public land. No closures should take place until the plan has been further clarified to the public. Proposal A is the only acceptable choice.	See general comment responses #19, #37 and # 84
Bill	Johnson	OHV Route Identification	It appears that once again the BLM is in the process of discriminating against motorized recreational users. The proposed restrictions in the San Rafael Swell, particularly those in the Chimney Rock, Summerville and Humbug trail systems shows BLM's disdain for a large and growing user group of Public Lands! We need to have more trail systems open not less. I would like to know how many miles of routes on Map 2-56 are open to unlicensed vehicles? This appears to be just another layer of stealth restrictions the BLM is going to burden motorized users with. My family and friends have been coming to the San Rafael for over 25 years. We are very concerned with more restrictions on Camping in open areas and layer upon layer of onus bureaucratic over regulation. All existing roads and trails need to remain open, there should be new trails opened to connect trail systems to form more looping trails. The present regulations on group size should be maintained. It's time the BLM stop bowing to the whims of radical environmental elitist groups and provide for a growing segment of the public that wish to camp and access our public land by motorized means.	See general comment responses #19, #20, #81, and #84.
Bobby	Johnson	OHV Route Identification	Information pertaining to the DRPM from the Price Field Office has come to my attention. Specifically in regards to the OHV use in the San Rafael Swell area. I am an outdoor enthusiast, I love to hike, camp and drive my four wheel drive vehicle. I have not had the chance to visit the San Rafael area but it is a place I would like to visit in the future for recreation purposes. It seems that the four alternatives, not including the no action plan, would severly limit the recreation in that area. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. The group size limits seem a little unreasonable for the way most four wheel enthusiasts recreate, clubs.	Please see general comment response #81
Bobby	Johnson	OHV Route	It seems that the plan is designed to be as obscure as possible about what trails will remain open. One example; BLM has stated that the Chimney Rock/Summerville Trail system will be designated open, but the trail system is	Please see general comment responses #19 and

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		Identification	not designated on the Preferred Alternative OHV Route Designation Map.	#31
Bobby	Johnson	Process and Procedures	The last issue that I would like to bring to your attention is in regard to the layers of management. The boundaries for these layers are not drawn in a way that I can easily know where OHV recreation and camping is allowed. It seems the complexities are made to confuse what the proposed alternatives will close.	Please see general comment response #37
Daryl	Johnson	OHV Route Identification	For 7 years I lived in Nevada and was fortunate enough to spend some time in the Price area as well as other areas in southeastern Utah. As I get older I am not able to hike and walk great distances so, I ask-am I to be prohibited from riding a 4-wheeler in the wilderness areas with my wife now that we have time to go back with our trailer and spend longer times than the day trips we were able to take before I retired. My wife and I have cheerfully paid our taxes for our working lifetime and feel at least a small entitlement to use some of the resources we have helped pay for.	Please see general comment responses #19 and #80
Daryl	Johnson	OHV Route Identification	We saw hordes of "mountain bikers" on some of our visits who were invariably young and unconcerned what impact their "usage" has on the areas. Do they have a greater right to use the area than my wife and I? If the years as taxpayers carries any weight we certainly have a greater right. Granted, some OHV users have emulated the mountain bikers we encountered in a banzai charge down the Bryan Head Peak road who nearly ran head on into our Bronco but with regulation and STRICT penalties for violations as well as a sharing attitude the area can be enjoyed by all.	Please see general comment response #19 and #79
Ferd	Johnson	Transportation and Access	roads and atv trails need to be left as is they have been there for years, and have not harmed the land. people need the access to the public lands.	Please see general comment response #10
Gary	Johnson	Transportation and Access	I want access to all the land without the restrictions that environmentalists want to impose, with your help.	Please see general comment response #10
Jeff	Johnson	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative.	Please see general comment responses #20 and #31
Jeff	Johnson	Recreation	BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises.	Please see general comment response #81
Judith	Johnson	Minerals and Energy Resources	As an owner of a small company that works closely with the oil and gas industry in Farmington, NM, I continue to feel strongly that industry must pay the true cost of development. Otherwise the oil and gas companies reap millions of dollars in profits, while those of us living in the area are left with a degraded quality of life. This decline in quality of life may be manifest in noise pollution from pumping, decline in air quality, and our favorite trails and scenic views destroyed by unregulated access that follows the oil and gas roads being built. This pattern is evident through the west, but in such a unique place as the Price region, special protection must be offered. Industry needs to pay for the best technology has to offer to mitigate its impact on the environment.	Please see general comment response #18

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Judith	Johnson	Minerals and Energy Resources	If BLM does allow for more drilling in these fragile areas, it must demand compensation from industry to allow for the hiring of an adequate number of rangers to manage these newly opened lands. To have one ranger for whole districts is ludicrous. Fees on off-road vehicle use and oil and gas leases should be increased to cover the law enforcement necessary to manage these areas.	Please see general comment response #18
Judith	Johnson	Wilderness	Land included in the 6 Wilderness Study Areas of the Price BLM region should remain undeveloped by oil and gas. Traditionally, study areas have been managed as Wilderness by the BLM and this practice needs to continue.	Please see general comment response #22
Kim	Johnson	Minerals and Energy Resources	Please do not open-up our remaining wilderness areas to oil and gas development.	Please see general comment response #101
Kim	Johnson	OHV Route Identification	Please do not open-up our remaining wilderness areas to off-road vehicle trails	Please see general comment response #12
Tom	Johnson	OHV Route Identification	As a regular visitor to these public lands I see ever greater impact from uncontrolled use of ORV¹s (including motorcycles). I see ORV tracks indiscriminately going anywhere and scarring the landscape. I see crushed vegetation, ravaged drainages, and damaged archeological sites as a result of this uncontrolled ORV use. If this pattern of abuse is allowed to continue I can only imagine that it will become much worse. In many places it is impossible to escape the sound of ORV¹s. What the ORV advocates often called "mixed use" is experienced as "dominating use" by non-motorized visitors to public lands. The experience of watching and listening to our public lands being destroyed before our eyes and ears is a heartbreaking thing, that discourages non-motorized visitors from returning to our own public lands. While there is undoubtedly a time and a place for ORV users to engage public lands it shouldn't be everywhere, and all the time. Since you are looking at defining a plan for the next 10-20 years, this explosive and highly damaging use of ORV¹s on public lands needs to be critically examined and addressed. I suggest the inclusion of the following guidelines for ORV use in the Price District RMP .	Please see general comment response #19
Tom	Johnson	OHV Route Identification	Prohibit the use of ORV¹s anywhere off of marked, designated routes.	Please see general comment response #19
Tom	Johnson	OHV Route Identification	Carefully assess each ORV route to insure that doesn¹t injure the environment or conflict with non-motorized use.	Please see general comment response #19
Tom	Johnson	OHV Route Identification	Close all ORV routes that enter any wilderness study areas or other areas that qualify as wilderness to protect them while they are being considered by Congress for wilderness designation.	Please see general comment response #12
Tom	Johnson	OHV Route Identification	Do not designate any areas as "open" to unlimited ORV use. This is a death sentence to the public lands that might receive this designation.	Please see general comment response #19
Robert	Johnston	Minerals and Energy Resources	I have learned that the BLM is considering opening up Utah's wilderness area for gas and oil exploration and/or drilling. Please consider that we have immediately renewable energy systems which have not been put in place, yet could supply the equivalent of all the extracted oil and gas.	Please see general comment response #101
Robert	Johnston	OHV Route Identification	Researchers have reported the damage done by off-road-vehicles is tremendous. Please halt the opening up of the wilderness areas	Please see general comment response #12
Stephanie	Johnston	Transportation and Access	I wanted you to know about a trip that my father and I took in my dad's Piper Super Cub (see attached photo of me and the Cub) when I was 10 in 2002. I am now thirteen, and it has been the best trip in my entire life. We landed at Mexican Mountain. While we were there we explored the canyons, camped and found petroglyphs. My	Please see general comment response #21

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			father and I kept saying that we had to bring the rest of our family there sometime. We are hoping to fly into Mexican Mountain with the rest of our family some time in the future. I will never forget how enjoyable Mexican Mountain made our trip. Next year I'm going to start attending piloting lessons. Ever since I've been to Mexican Mountain, I have dreamed of flying my own family out there someday. I know they will absolutely love it, because it's such a peaceful and fun environment to experience. I appreciate that the BLM has kept the backcountry airstrips open for people like my father and I to enjoy.	
Allen	Jones	Process and Procedures	We have moved to Southern Utah primarily because of the incredible beauty of its national parks and monuments - supposedly managed and protected by the BLM. We have been shocked by the BLM's 'sell-out' to commercial drilling increases and ATV enthusiasts. We therefore strongly support the Castle County Heritage Plan that protects special places and provides more than adequate ATV routes. Why do we have to drill for small quantities of natural gas and oil in the most beautiful places in our country. Once these wonderful places are damaged, they are gone forever.	BLM does not manage National Parks and no national monuments or parks are within the Price Planning Area. BLM manages under multiple use RMPs. Please see general comment response #35 in regards to the Castle County Heritage Plan.
Douglas	Jones	OHV Route Identification	It is common knowledge that ORV's cause a severe desecration of the pristine nature of the proposed areas and restrictions of such need to be put into force. It is urged that the BLM fully analyze each proposed motorized route to ensure that environmental and social impacts are minimized. Please ensure that the BLM does not designate any "open areas" where ORV use is allowed without limitation, and that they not designate ORV trails on lands within America's Redrock Wilderness Act or existing wilderness study areas like Sids Mountain.	Please see general comment responses #12 and #36
Gene and Kathy	Jones	OHV Route Identification	We are native Utahans and love this great State. Much of the area impacted by the management plan is spectacular country that deserves protection, including the arras within America's Redrock Wilderness Act (the Act). Please preclude oil and gas development from these areas. The potential for a meaningful contribution to the consumption of oil and gas in this country is minimal and the potential for harm to this pristine land is enormous. We especially urge you to restrict ORV access to specified areas outside of the lands within the Act, or any wilderness study areas. Clearly, allowing ORV use in these areas would be highly incompatible with the concept of a wilderness or wilderness study area. Where areas are designated for ORV trails, please ensure safeguards are in place to further ensure that ORV uses remain on the designated trails. As you know, certain ORV users, hopefully a small minority, are inclined to ignore posted trail restrictions by cutting new trails. And please do not permit any open areas for unrestricted ORV use, and the scaring of the land and habitat destruction resulting there from.	Please see general comment responses #12 and #36
Joe	Jones	Minerals and Energy Resources	It is plain wrong, and a violation of the BLM's own "multiple use" mandate, to make oil and gas development a priority over all other values as the Bush Administration has apparently instructed.	Please see general comment responses #99
Joe	Jones	OHV Route Identification	These travel plans should implement effective and frequent monitoring of ORV impacts; set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs; and plan and budget for adequate enforcement of travel plans. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, the BLM should not allow ORV use.	Please see general comment response #19
Joe	Jones	Transportation and Access	These travel plans should designate and clearly sign motorized routes, but only where conflicts with other users or resource values do not exist	Please see general comment response #10

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Joe	Jones	Transportation and Access	These travel plans should include an effective trail enforcement plan	The RMP/EIS calls for travel management planning including law enforcement in key areas. Law enforcement is an administrative function rather than a planning decision. The level of effort is determined through annual work plans based on need and budgets . Public education and proper signing of trails would be required under all alternatives and would reduce the need for law enforcement.
Kirt	Jones	OHV Route Identification	In regard to the forthcoming Price RMP, I feel that the public (me included) are in the dark as to the particulars of the plan as it relates to off- highway recreation. Clarification of what trails are to be closed and what areas will be restricted to OHV travel is needed.	Please see general comment responses #20 and #31
Kirt	Jones	OHV Route Identification	I also oppose outlawing dispersed camping and further "group size limits".	Please see general comment response #81
Kirt	Jones	OHV Route Identification	I, being a local native and a member of the SouthEastern Utah OHV Club, am opposed to any further restrictions on my right to travel existing roads and trails, (realizing, of course, that un-roaded areas should be protected). Please do not allow management of my public lands to be hijacked by radical environmental interests who were not elected or appointed to do so.	Please see general comment response #19
Leon	Jones	Livestock Grazing	The traditional grazing allotments need to be reevaluated in light of the severe drought and the inability of permittees to control their cattle. Please restrict grazing to only those areas that make sense.	Please see general comment response #33
Leon	Jones	OHV Route Identification	I think that many of the routes in Alt A and B designate far too much open routes particularly in the San Rafael Reef area and that the open trails will encourage off road vehicles to trespass on private land and WSA areas where they have no business being. Please only allow motorized travel to only those routes that can be monitored and controlled.	Please see general comment responses #15 and #19
Lyle	Jones	Alternative Maps	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative.	Please see general comment responses #20 and #31
Lyle	Jones	OHV Route Identification	Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	Please see general comment response #19
Lyle	Jones	OHV Route Identification	The essential role of non-profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreational clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as	Please see general comment response #81

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			"matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's group size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50 vehicle group size limit.	
Pat	Jones	Socioeconomics	As a business owner and employer in Castle Dale, I am well aware that industry (coal, oil, and natural gas) drives our economy here in Eastern Utah... I believe the current Resource Management plan underestimates the damage that will occur to our local economy due to excessive regulation and locking of additional public lands reducing multiple uses. Please conduct a complete economic study that will give us an idea as to just how much money Eastern Utah will lose resulting from your RMP decisions.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of recreation to local communities, such as Emery and Carbon counties. The DEIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities. Due to incomplete data on recreational activities, the analysis was unable to quantitative estimate changes in jobs and earnings tied to recreation in the local area. The analysis was re-edited to further evaluate these impacts and is discussed in Chapter 4, Section 4.6. An additional estimate of the monetary oil and gas impacts of the RMP on all of the other alternatives using forecasted gas prices will be provided. However, impact analysis will not be based on the monetary value of production due to the uncertainty of gas prices.
Ramal and Carole	Jones	OHV Route Identification	The recent road closures by BLM has severly curtailed those activities (camping, wildlife viewing, recreation and scientific studies in paleontology). The disbursed camping sites that we used, the roads that we used to access them are now closed. The roads we used for wildlife viewing are closed. The roads we used to access paleontological sites with scientific groups and other interested parties, are now closed... As you can see most of the activities we enjoy in the San Rafael Swell require access. Otherwise everyone is bottled up along those main roads which are for the most part county roads. This destroys the wilderness camping experience.	Recent road closures resulted from the San Rafael Route Designation Plan of 2003. The San Rafael Route Designation Plan designated approximately 670 miles of routes for recreational OHV use, including four routes within the Sids Mountain WSA that are open on the condition that they continue to meet the WSA non-impairment standard. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. The impacts of continued implementation of the San Rafael Route Designation Plan are analyzed in Chapter 4 of the Proposed RMP/Final EIS.
Ramal and	Jones	Recreation	You said in the previous management plans that dispersed camping was very important and would be given a	Please see general comment response #81

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Carole			high priority. As you can see by closing all these short feeder roads you have almost done away with disbursed camping... I do not want to see any commercialized or fee campgrounds in the San Rafael Swell. I do not want to see the BLM improve the campsite this takes away from wilderness experience, just give us access to the area.	
James	Jordan	Minerals and Energy Resources	It is unfortunate that Bureau of Land Management is favoring oil and gas interests at a time when it should be encouraging the use of BLM lands for renewable, less environmentally invasive or destructive energy sources. It is immoral to permanently scar the land for oil and gas production when it can be used, for example, for solar-powered or wind-powered energy generation.	Please see general comment response #18
James	Jordan	Wilderness	The draft favors a few special interests - the oil and gas industry and those who wish to despoil the wilderness by gaily cavorting on off-road vehicles. The draft leaves 98% of wilderness-quality lands open to drilling, increasing by nearly 20% the amount of land open to leasing without restrictions. Please revise the draft to protect places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon from oil and gas development and excessive ORV use.	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Nina	Jorgensen	OHV Route Identification	I would also love to see off-road-vehicle use maintained in designated areas with specific trails where such activity will limit destruction of fragile public lands.	Please see general comment response #19
Nina	Jorgensen	Wilderness	I'm urging you to refrain from allowing gas and oil development in designated wilderness areas.	Please see general comment response #120
Vickie	Jost	OHV Route Identification	I believe it would be a shame if ORV use were allowed to expand too much into public lands. I can see here in northern Utah what ORV's do to the vulnerable hillsides. Please see that specific trails are designated for their use in the Red Rock area of Utah.	Please see general comment responses #19 and #36
Vickie	Jost	Wilderness	I would urge the BLM to protect citizen proposed wilderness areas. I did not realize the beautiful Red Rock area of southern Utah was even there until we drove through there three years ago while moving to northern Utah. What a fantastic place! I can't wait to see more of the area. Even though we have driven through there a few times; we have never taken the time yet to really explore the out-of-the-way places. I understand that there is much wildlife to see in the Nine Mile Canyon area. Please protect this area and other areas of Utah's Red Rock country such as San Rafael Swell, Muddy Creek and Desolation Canyon as well.	Please see general comment response #36
Allan	Juers	Wilderness	The draft BLM land use plan does not protect any additional wildlands as true wilderness. This zoning of beautiful landscapes for oil and gas leasing, drilling and development is criminal. The proposed 3500 road designation will surely lead to increased motorized traffic that will hurt the environment. Once such beautiful areas divorce from improper use, they will never be restored. Please reconsider the actions of the proposed land use plan and live up the true character of the BLM- protection as well as use.	Please see general comment response #36 and #109
Linda	Kadas	Minerals and Energy Resources	This beautiful landscape belongs to me and my fellow Americans and I chose not to have it destroyed by some greedy, nonvisionary gas monger. The U.S. Geological Survey estimates that oil and gas deposits under America's Redrock Wilderness would amount to a mere 4 days worth of oil and less than 4 weeks worth of	Please see general comment responses #18 and #36

First Name	Last Name	Category	Comment	Response
			natural gas.	
Gust	Kalatzes	Socioeconomics	Economic Value to Carbon and Emery County's: As you are aware, both Carbon and Emery County have been mineral based community's for possibly more than 100 years and we have ridden the roller coaster of our economy for many decades, always worried about what mine will close next, etc. This has been a difficult place to stay in business for certain, trying always to keep lean operations and working staff harder than others, just in case. Others and myself have recently presented aviation's economic value to Carbon and Emery Counties. This effort was to present the very low impact aviation really has to the environment and the significant recreational value that it now has and certainly the larger value it could have! Many have proved and all have agreed this venue of aviation recreation would add revenues to our expiring mineral based economy and cannot or should not be sacrificed. In 2003 Carbon County airport had 14,550 operations and expects 15,675 operations in 2005. The number of visitors brought in to Price in 2003 was 5,480 spending a total of $759,700 in "direct" visitor related economic output. When combined with the multiplier effect, the Carbon County Airport is responsible for $3.98 million in total economic output, supporting 49.5 jobs. In the above numbers, many of these visitors have stopped to fuel up and make their way to these "backcountry airstrip trailheads" and have mostly gone unnoticed to the general public. Tourism's expansion by aircraft to our area will continue to become a very important part of our economy as our minerals deplete over the next couple of decades.	See general comment response #132.The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses including recreation. This analysis evaluates the economic impacts to local communities in terms of jobs and income related to these uses. A discussion of the analysis is provided in Chapter 4, Section 4.6. In addition, the Price BLM is not currently planning on any airstrip closures through this RMP revision process. Any future closure of existing backcountry airstrips would be done only on a case-by-case basis and would adhere to the following provisions. Section 345 of Public Law 106-914 states that the Department of Interior can not permanently close aircraft landing strips, officially recognized by State or Federal aviation officials, without public notice, consultation with cognizant State and Federal aviation officials and the consent of the Federal Aviation Administration. Landing strips damaging soil and water resources or impeding agency compliance with existing laws and/or regulations may be closed following appropriate public notice, consultation and consent. Short-term closures are not affected by this provision.
Gust	Kalatzes	Transportation and Access	The airstrip list within the scope of the RMP that I would like you and your staff to include along with the 4 you have listed are, Bowknot Bend, Cliff Dweller Flat, Daddy Spring, Gruver's Mesa, Horseshoe Canyon, Sage Brush Bench, Stone Cabin Gas Field, Sweetwater Reef, Tavaputs Ranch, Temple Wash, and there may be others I've not listed. My comments are in favor of these "backcountry airstrip trailheads" for their continued "casual use", limited commercial use such as tourism including tours/drop offs, future mineral exploration, a backcountry training school, search and rescue operations, fire operations and certainly their significant historic value... In closing, Mr. Johnson and staff, I am requesting the 4 "backcountry airstrip trailheads", Cedar Mountain, Hidden Splendor, Mexican Mountain, Sage Brush Flat/Peter's Point remain in the RMP and that Bowknow Bend, Cliff Dweller Flat, Daddy Spring, Gruvers Mesa, Horseshoe Canyon, Sage Brush Bench, Stone Cabin Gas Field, Sweetwater Reef, Tavaputs Ranch, Temple Wash, and any others I've not listed, be mentioned in the plan with some type of "official language" to safeguard their future. This future affects casual use, historic value, safety, economic value, future low impact mineral exploration, tourism tours and drop-offs, a backcountry training school, search and rescue and fire fighting operations. To date, the cost of maintenance of these "backcountry airstrip trailheads" has been accounted for through volunteerism and there is virtually no cost to the BLM. There is however, a limit to the amount of work that can be done with hand tools maintaining these backcountry airstrip trailheads and perhaps the BLM could work with the UBCP group for instance, to allow some mechanical maintenance where appropriate. This type of maintenance may only be required every 5 or 10 years but I believe	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
			a cooperative effort could be managed with guidelines from the BLM as their support. They are existing features, extremely low impact and continued "casual use" and access should be insured.	
Gust	Kalatzes	Transportation and Access	The airstrip list within the scope of the RMP that I would like you and your staff to include along with the 4 your have listed are, Bowknot Bend, Cliff Dweller Flat, Daddy Spring, Gruver's Mesa, Horseshoe Canyon, Sage Brush Bench, Stone Cabin Gas Field, Sweetwater Reef, Tavaputs Ranch, Temple Wash, and there may be others I've not listed. My comments are in favor of these "backcountry airstrip trailheads" for their continued "casual use", limited commercial use such as tourism including tours/drop offs, future mineral exploration, a backcountry training school, search and rescue operations, fire operations and certainly their significant historic value.	Please see general comment response #21
Gust	Kalatzes	Transportation and Access	Continued "Casual Use": It has been proven these "backcountry airstrip trailheads" can co-exist in many different types of federal and state "land designations" such as in wilderness areas in Idaho where some 18 or more "airstrip trailheads" have existed for decades, Denali Park in Alaska and other such areas. Aircraft "transportation" is another type of conveyance unlike that of a typical automobile or off road vehicle and have an extremely low impact on the land they roll over. They do not have driven wheels that potentially tear up the surface of the ground and when landing, they are whisper quiet. The fact is that leaving these "airstrip trailheads" does not and has not had any undesirable affect to the land, wildlife or eco systems in these sensitive areas. The combined total acreage of these "backcountry airstrip trailheads" would take up only a mere 30 acres out of the tens of thousands of acres in the scope of the this RMP. The continued freedom we enjoy with continued "casual use" as to these "backcountry airstrip trailheads" is imperative and is exactly what defines our great country. Special interest fanatics alone, who if they had their way, would eliminate freedom to the elderly, disabled and others, who are otherwise unable to hike in, repel down, etc. Federal lands need to be preserved but at the same time accessed by all who would not otherwise have that opportunity without aircraft as their conveyance. Also, continued "casual use" is the right of "all" and a plan that does not include "all" is not a very good plan when it relates to public lands of any designation. Conveyance by aircraft is a very low impact way to access this backcountry, uses very little land and nothing but footprints leave the "airstrip trailhead".	Please see general comment response #21
Gust	Kalatzes	Transportation and Access	Historic Value: These airstrips were designed and built for specific purpose. Some more than 50 years ago, and they do represent a real piece of our local history. Any plan to erase a significant piece of our two counties historic value, brought by mineral exploration and these old airstrips, would be a real loss to our communities. Although built for the purpose of mining, Hidden Splendor backcountry airstrip for example, is very closely attached to some of the most recognized people in aviation history.	Please see general comment response #21
Gust	Kalatzes	Transportation and Access	Search and Rescue Operations: I have been pilot on many search and rescue operations assisting sheriff's of both Carbon and Emery County in areas of Swasey's Leap, Nine Mile, Woodside/Price River area, the highway 6 and I-70 junction area, Goblin Valley, areas surrounding I-70 directly south in Emery County, found stolen vehicles in the mountains of Carbon County and I have assisted farmers search for lost cattle. I have discussed this issue with the sheriff's of both counties and they are in favor of saving any airstrip that would assist in these search and rescue operations in the backcountry. There are never enough airstrips in the backcountry when doing search and rescue operations and the few there are must remain.	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
Gust	Kalatzes	Transportation and Access	Tourism, Tours and Drop Offs: The local operator of the Carbon County airport has spent significant efforts to build up his business which includes scenic flight tours to the back country, Tavaputs Ranch, fire fighter drop-off and pick-up and direct-to flights. Tavaputs Ranch airstrip is another "airstrip trailhead" that exists on BLM land and was closed to the Tavaputs Ranch and it's operations. This airstrip was built sometime in the early 60's by Mr. Don Wilcox and was operated by him for his tourism operations. As you know, some of the biggest stars in show business have visited this ranch. More than half of the existing airstrip was on BLM land for almost 30 years. I am not clear as to the continued "casual use" for the public portion of this backcountry airstrip but I would like to see it added to your RMP. Tavaputs now only maintains and uses the portion of the airstrip that is on private land for their limited commercial operations, which of course will continue, but perhaps a cooperation between the BLM, Tavaputs Ranch and the UBCP could allow safe public access to this area on the BLM portion of the airstrip and also continue to allow access to the ranch by the public should they so desire. Through this kind of cooperation in managing this beautiful "backcountry airstrip trailhead", the two portions of the runway can once again be connected for everyone's benefit. This would not restrict either runway portion to specific aircraft or reduce safety significantly due to its high altitude density. Also it would not deprive the public from visiting this wonderful place by aircraft. This ranch offers food, lodging facilities and has one of the most spectacular views ever offered in Carbon and Emery County but currently does not allow the public to land on the private portion due to liability concerns and the ranch does not maintain the BLM portion any longer. The additional length and public access of the Tavaputs Ranch airstrip must be restored to offer continued "casual use" and very limited commercial use which would add significant safety margin, allow fire operations, would serve as an emergency airstrip for passing aircraft and its specific economic value to Carbon and Emery County.	Please see general comment response #21
Gust	Kalatzes	Transportation and Access	To date, the cost of maintenance of these "backcountry airstrip trailheads" has been accounted for through volunteerism and there is virtually no cost to the BLM. There is however, a limit to the amount of work that can be done with hand tools maintaining these backcountry airstrip trailheads and perhaps the BLM could work with the UBCP group for instance, to allow some mechanical maintenance where appropriate. This type of maintenance may only be required every 5 or 10 years but I believe a cooperative effort could be managed with guidelines from the BLM as their support. They are existing features, extremely low impact and continued "casual use" and access should be insured.	Please see general comment response #21
Gust	Kalatzes	Transportation and Access	In closing Mr. Johnson and staff, I am requesting the 4 "backcountry airstrip trailheads", Cedar Mountain, Hidden Splendor, Mexican Mountain, Sage Brush Flat/Peter's Point remain in the RMP and that Bowknot Bend, Cliff Dweller Flat, Daddy Spring, Gruvers Mesa, Horseshoe Canyon, Sage Brush Bench, Stone Cabin Gas Field, Sweetwater Reef, Tavaputs Ranch, Temple Wash, and any others I've not listed, be mentioned in the plan with some type of "official language" to safeguard their future. This future affects casual use, historic value, safety, economic value, future low impact mineral exploration, tourism tours and drop-offs, a backcountry training school, search and rescue and fire fighting operations.	Please see general comment response #21
Wayne	Kammerer	Minerals and Energy Resources	I strongly urge that any proposed oil and gas development be thoroughly reviewed and that stringent protections be enforced to protect the magnificent scenic and wilderness values present in the area encompassed by the Price RMP. The scenic values in area rate up to and include some of the most valuable scenic wonders in North America. I would believe that if these values were found virtually anywhere else in the forty-eight contiguous states they would have already received National Park or National Monument designation.	Please see general comment response #18
Wayne	Kammerer	OHV Route	While I too owned and enjoyed ATVs for several years, I did observe first hand the persistent and nauseating	Please see general comment response #19

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		Identification	destruction that off-road vehicles inflict on the environment in Utah. Virtually every area within the Price RMP that is accessible to ATV's trail bikes, etc. should be protected from the damage inflicted by these vehicles. The only areas largely immune from this damage are pure sand dunes.	
Wayne	Kammerer	Soil, Water and Riparian	The unique wildlife and environmental values within the Price RMP area deserve protection and preservation for enjoyment by future generations and the enhancement of human life. Watersheds are extremely vulnerable to desecration by industry and motorized recreation. I urge protection of these values in one of the most arid regions in what is, in my opinion, America's most scenic state (outside of Alaska).	Please see general comment response #67
Don	Kauchak	Process and Procedures	I am in favor of your adopting the Castle County Heritage Plan. It would preserve an area that is too beautiful to ruin with oil rigs and ORV scars on the land.	Please see general comment response #35
Don	Kauchak	Recreation	It opens too much land to oil and gas exploration and has the potential to ruin some beautiful terrain through overuse by ORV's. ORV use should be carefully limited and prescribed and should not encroach on America's Redrock Wilderness Area or other areas like Sids Mountain.	Please see general comment responses #14, #19 and #36
Homer and Patricia	Kearns	Minerals and Energy Resources	We also want to urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling and subsequent development. As you well know, these activities will seriously threaten important habitat for a wide variety of wildlife.	Please see general comment response #101
Sara	Keckeisen	Minerals and Energy Resources	These midlands should be closed off to oil and gas development.	Please see general comment response #18
Sara	Keckeisen	OHV Route Identification	Luckily, the off-road vehicle activity is now pending in Congress. I want this recreation to be prohibited.	Please see general comment response #19
Don and Bonnie	Keele	OHV Route Identification	There is no "designated" trail system for motorized recreation in the DRMP and DEIS for the Price Field Office. There is no plan in any of the alternatives. There is no map available to the public for us to see what roads/routes/trails the BLM is closing. The map of your preferred Alternative looks like hen scratches with no way to identify what the scratches are. The BLM's plan for quotas and permits for diversified camping and motorized use is also unacceptable.	Please see general comment response #19 and #32
Anne	Keeling	OHV Route Identification	With the ever-increasing popularity of ORV's, the BLM needs to complete a comprehensive route designation plan within the Price Field Office that considers non-motorized users of public land and protecting sensitive areas that will be ruined by continued ORV use. Further, I believe that ORVs are not appropriate in citizen-proposed wilderness areas.	Please see general comment response #19
Andrew	Keller	OHV Route Identification	Please limit ORV use to specific trails so that all other public lands are protected from the noise, soil erosion, and degradation caused by ORVs. ORV trails should be clearly mapped and signed, and BLM needs to develop effective enforcement plans to protect Utah's unique landscape from damage by inappropriate ORV use.	Please see general comment response #19
Andrew	Keller	Wilderness	I am writing to urge you to consider the following when drafting the RMPs: -Please protect all citizen proposed wilderness areas, such as those in the San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek, which are under the Price Field Office jurisdiction. -Please do not offer proposed wilderness lands to oil and mineral development. We cannot squander these special places for short-term gain; they must be preserved undisturbed for future generations to enjoy.	Please see general comment response #109
Alison	Kelly	OHV Route	I hope that the BLM protects its vast landholdings in Utah by providing opportunities for all kinds of recreation,	Please see general comment response #19

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		Identification	while maintaining its biological integrity through designated OHV areas and maintaining wilderness area.	
Dana	Kelly	Minerals and Energy Resources	Drilling impacts are large enough that they affect recreational opportunities to others who visit the area, and ruin the wild quality of the region.	Please see general comment response #18
Kathy	Kelly	Minerals and Energy Resources	Again, the BLM is giving away Americans' national heritage by opening it up to drilling and exploration and leaving it unprotected from off-road vehicle use. I oppose the BLM's new draft management plan (the Price Resource Management Plan, or RMP). Although "balance" has been the cover for opening up too much of our remaining wildlands, this plan doesn't pretend to balance preservation, recreation, and energy development. Opening 98 percent of lands that are clearly wilderness quality to drilling and opening unrestricted leasing on 20 percent of lands is no balance.	Please see general comment responses #36 and #101
Kathy	Kelly	OHV Route Identification	Although designating specific trails for off-road vehicle (ORV) use is an essential move, and I support it, 2 million acres is too much land to permit such traffic on, to the detriment of wildlife, habitat, and low-impact users who prefer quiet.	Please see general comment response #19
Michael	Kelsey	OHV Route Identification	Here is my main complaint regarding uses of public lands. Everywhere I go, I come across ATV tracks. They are virtually everywhere! Those people are doing the same thing I'm doing - just out exploring - but I do it on foot, they're doing it on motor vehicles, mostly ATV's. This is something I see all over the state of Utah. All it takes is for 2 or 3 ATV's to wander over yonder, and come back the same way, and you have a road. Then the next guy comes along and says, "hey, here's a road, let's go" Then it's hard as hell to stop it. It's been my feelings for years, that instead of going around looking for little places to be made into wilderness areas, we should instead ban motor vehicles altogether from all public lands in the USA, then look for a few small places near towns and where there are no cattle, and make those areas into ATV parks. Also, charge big money for permits or licenses and use that money to pay for fencing and for someone to police the area.	Please see general comment response #19
Celeste	Kennard	OHV Route Identification	I am particularly concerned with off road vehicles in the San Rafael Reef area. I love visiting there because the quiet wilderness feeling that one can get in the Reef; however, off road vehicle tracks through some of the areas, especially in ephemeral stream beds really destroy some of the places where I look for hard to find plants.	Please see general comment response #19
Celeste	Kennard	Special Status Species	Also, please consider restricting ORVs in all areas that may have plant species such as Penstemon grahamii (Carbon County), and Gilia tenuis.	Please see general comment response #7
Linda	Kervin	Minerals and Energy Resources	Oil and gas development is another use which endangers the desert. Please keep the areas proposed for wilderness free from oil and gas development in order to preserve their natural beauty and the fauna and flora which reside there.	Please see general comment response #18
Linda	Kervin	OHV Route Identification	They should be allowed on designated trails which are signed as such. Many of these bees are ground nesting and could be especially adversely impacted by unregulated ORV use.	Please see general comment response #19
Joe	Keys	Recreation	As both a private and commercial river runner I am 100 opposed to Alternative "D" that concerns limiting motorized use in Desolation and Gray Canyons... Motorized trips are able to move quickly as needed which helps to spread groups out... 2 stroke engines whine run with synthetic oils and tuned properly have emissions similar to that of a 4 stroke engine... Limiting motor trips to 90 per year will only create conflict during low water periods and who sill these permits be allocated to? I would prefer the "no action alternative" concerning motorized use in Desolation/Gray canyons.	Please see general comment response #34
Jen	Kidder	Minerals and Energy	I am writing concerning the recent additional permits granted for drilling along the rim of Desolation Canyon in UT. I just completed an extended trip through the canyon via canoe, and was struck by the natural beauty,	The Desolation Canyon portion of the Green River, including the rim of the canyon is in a WSA where

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		Resources	peacefulness, and history in buildings, petroglyphs, and pictographs. It is a rare thing for people to be able to travel for almost two weeks without being interrupted by civilization. My trip was through the NOLS based in Lander, WY. NOLS is an accredited school that focuses on outdoor skills, developing student leadership skills, and environmental education. As both an environmental advocator and participant in the NOLS program, I feel strongly that allowing oil rigs within an influential distance of the canyon rim is a mistake. Oil rigs within hearing and sometimes visually will effectively end the feeling of wilderness in the canyon. Tourists will be unlikely to want to use the river recreationally. Schools and other educations will not continue to use the river for educational purposes. Oil rigs are already drilling in the area. Adding a few more rim drills will not increase significantly oil profits, and is impractical given it will make the even less multi-purpose when recreation lists no longer want to use the river. BLM land is to be multi-purpose, not favoring one party so much it forces others out. Please keep Desolation Canyon Beautiful and keep drilling off the rim!	oil and gas leasing is not allowed under any of the alternatives analyzed in detail.
William	Killpatrick	Minerals and Energy Resources	The question in my mind, assuming that these lands ARE opened to energy development, is: JUST HOW MANY DAYS OF ENERGY INDEPENDENCE WOULD AMERICA GAIN? IF THE ANSWER TO THAT CAN'T BE MEASURED IN DECADES AND CENTURIES -- WHICH IT CANNOT -- THEN TO SQUANDER SUCH A PRECIOUS RESOURCE FOR SHORT-TERM GAIN IS NOT IN KEEPING WITH THE BLM's MANDATE OF PRESERVATION AND PRUDENT MANAGEMENT OF OUR PUBLIC LANDS. It's also, to put it a bit bluntly, just plain stupid. Gaining a few months of energy, while lining the pockets of the energy industry is hardly a worthy use of land that cannot be salvaged or restored once opened to such development. Our focus needs to be on development of alternative energy resources. The sooner we stop looking for a few days' worth of energy here and there, the sooner the energy industry will take seriously the need to focus its resources on non-fossil fuels.	Please see general comment response #18
Lucile	Kimball	Minerals and Energy Resources	I would ask that you seriously consider the impact of drilling and exploiting any of our states wilderness areas.	Please see general comment response #101
Lucile	Kimball	OHV Route Identification	They are slowly being taken over by development and mining and drilling and off-road vehicles.	Please see general comment response #19
Ken	Kirkwood	OHV Route Identification	I know the OHV community submitted route info on these trails. I know this because I helped GPS the routes. I understand these trails are not in any of the maps. How can this happen again? This is exactly what you did with the San Rafael trails! How can you continue with this discrimination against OHV users? These trails must be recognized and kept open. I was involved in the motorcycle club that held off road races in the Chimney Rock area in the 1980's, races that your office permitted, and you now are saying these trails do not exist. Please explain this! There is no excuse for your failure to include these trails and to keep them open.	Please see general comment responses #20 and #31
Ken	Kirkwood	Recreation	I am also very interested in what you plan to do with dispersed camping in this area. It is not clear to me in your alternatives what you plan to do. My family and I enjoy camping and riding in this area and have done so for 20+ years. We do not enjoy camping in what you call a campground or designated camping area like the one you have near Temple Mountain. I will never camp in a place like that. We need dispersed camping and there is no justifiable reason to not allow this! Please include ALL users of public land!	Please see general comment response #81
Alex	Kirry	OHV Route Identification	What's up champ? Listen, I'm not from Utah but I've lived here as a student for some time. Utah's natural wilderness lands are some of the most precious and beautiful resources in the state. If we continue to 'piss' on such lands because of misuse (including Desolation Creek, Mexican Mountain, and Upper Muddy Creek) of off-road vehicles, our children and their children will never be able to enjoy the aforementioned beauty that these lands have under the supervision of the Price Field Offices. Think about it.	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
Michael	Kleineider	OHV Route Identification	Please don't close up and restrict the San Rafael swell lands. My children and I ride that area and it would be a shame to put it off limits to families like ours, who respect the land and tread lightly.	Please see general comment response #19
Cheri	Kliewer	Minerals and Energy Resources	Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict. Although the BLM has confirmed that more than a million acres of lands in this area qualify for federal wilderness protection and 1.5 million acres are included in America's Redrock Wilderness Act, the draft plan would open virtually all of these wildlands to oil and gas development, threatening such renowned treasures as the remote and wildlife-rich Book Cliffs as well as Desolation and Labyrinth canyons. In all, the plan would open some 98 percent of lands that should be preserved as wilderness to drill pads, roads, waste pits and more. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development.	Please see general comment responses #36 #101
Cheri	Kliewer	Wilderness	Utah's red rocks are beautiful and as a part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act.	Please see general comment response #36
Ber	Knight	OHV Route Identification	The following comments simply reflect puzzlements from reading the DEIS; I have no intimate knowledge of the Desolation Canyon area (other than one small-group motor trip along Range Creek ten years ago, with permission from Mr. Wilcox): (I have restricted my comments here to Alternative D.) Map 3-16 shows, as open to limited OHV travel, a small area south of the Turtle Canyon WSA, apparently in the Big Horn Benches area, yet the Route Designations in Alternative D, Map 2-56 shows no road access. The ROS map 3-15 shows most of the Turtle Canyon WSA as Primitive, but it is not included in the SRMA Map 2-21. One wonders why the Desolation Canyon WSA (if released) has a classification while Turtle Canyon WSA does not. Which leads to the question of how the ROS classifications on Map 3.15 were determined and whether there may be review of that determination. Further comment: I think the RAC Subgroup is bringing to your attention the apparent contradiction (Maps 2-21 and 2-25) in considering part of Sids Mountain as both Primitive and High Use.	Apparent inconsistencies in the Draft RMP/EIS have been resolved. In the Proposed RMP/Final EIS maps 2-15 through 2-19 show the Off Highway Vehicle Area designations for each of the alternatives, and Maps 2-71 through 2-74 show the OHV Route Designations.
Michael	Knight	Alternative Maps	I am concerned about the significant and confusing changes these proposals would have to the San Rafael Route Designation plan that was just instituted. In other words, just when the public is getting accustomed to those restrictions and changes, another layer of confusing restrictions are being proposed. For example, you have stated that the Chimney Rock/Summerville Trail system will be designated as open, but it is not included on the Preferred Alternative OHV Route Designation map. There are also contradictory instances of reference to open trails that are already closed and vice versa.	Please see general comment responses #19, #20 and #31
Michael	Knight	OHV Route Identification	I am concerned about the confusing restrictions recently published in the RMP but I am even more concerned now that I have been made aware that complete OHV routes that have existed for years, and that were properly documented and mapped and submitted to your office, were completely ignored. This is very disheartening to those who have spent the time, resources, and money to ensure these OHV routes are preserved. Please publish a revised draft identifying the Chimney Rock/Summerville trail system as well as the Arappen Trail connector routes.	Please see general comment responses #20 and #31
Michael	Knight	OHV Route Identification	I also want to comment on my concern about the confusion about interpreting where dispersed camping is available. Dispersed camping is incredibly important to me and my family. We enjoy the ability to camp in primitive dispersed camping areas and enjoy the solitude and beauty available in such areas. Without a clear	Vehicle camping in the identified recreation management zones (referred to as high-use areas in DRMP) would be allowed in developed and

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			understanding of where a family can or cannot camp makes turns an otherwise enjoyable excursion into a frustrating experience. Please realize that existing open OHV routes are important to me and my family. Further restrictions and confusing language and contradictions within the RMP need to be corrected.	designated sites. Dispersed and vehicle camping regulations and number of designated sites outside the identified recreation management zones within the San Rafael Swell SRMA will be determined at the time the San Rafael SRMA activity plan is completed. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives analyzed in detail.
Michael	Knight	Transportation and Access	Most people desire to abide by the current restrictions, but making it more confusing and complicated is not the answer. Additional significant trail closures are not the answer either. This only serves to concentrate people in more confined areas rather than dispersing them throughout the Swell allowing for the remoteness and seclusion we all are seeking (regardless of our recreational interests).	Please see general comment response #10
Robin	Knight	Recreation	As more people come for recreation more ORV trails, hiking and horseback riding trails need to be designated and maintained thus encouraging ORV riders to use those trails and not run all over where they choose.	Please see general comment response #15
Robin	Knight	Wilderness	I would like to encourage you to continue efforts to increase and protect Utah's Wilderness areas.	Please see general comment responses #36 and #108
Jan and Gayla	Kobialka	OHV Route Identification	We also urge BLM to close the proposed wilderness areas to off-road vehicles, so the ORV damage will cease. The draft plan is wrong to let ORVs continue driving on hundreds of miles of dirt tracks that have made scars all over that magnificent desert country. The damage is getting worse year by year, and wilderness values are deteriorating. A constructive "Castle Country Heritage Plan" has been proposed by local citizen groups, to bring a more balanced approach to ORV activities in the Price plan. Please include the Heritage Plan in revising the Price draft plan.	Please see general comment responses #12 and #35
Jane	Koerner	OHV Route Identification	I urge the BLM to protect these fragile places from ORVs. There should be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that should also be protected from vehicles that can, and do, go wherever they please: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; the Price River proposed wilderness area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment responses #12, #19 and #31
Jane	Koerner	Process and Procedures	After reviewing your proposed management plan for the area, I was deeply disturbed to see that your plan falls far short in protecting this invaluable economic and scenic asset of the state. I think the citizen's alternative, the Castle County Heritage Plan, is far more visionary in the balance it strikes between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Robert	Koff	Minerals and Energy Resources	In the area of oil and gas leasing, I believe that too much land of wilderness quality is being opened up. As a former petroleum engineer, I am well aware of the impacts of oil and gas drilling. The roads and facilities will permanently damage many areas that should remain roadless. Furthermore, it would be a shame to sacrifice these lands for the kind of marginally economic oil and gas deposits that the area has a history of containing.	Please see general comment response #101
Robert	Koff	OHV Route	Off-road vehicle use in your management area is a big problem, as you well know. I would ask that any management plan take this into account, with the idea of effectively regulating the use of ORV's and providing	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
		Identification	areas for their use while having enforceable restrictions. As a hiker and backcountry user, I would like to see these vehicles severly limited. They damage not only the countryside, but the peace of the countryside.	
Robert	Koff	Process and Procedures	I would ask that oil and gas exploration and ORV use be excluded in such areas for which protection is being sought in America's Red Rock Wilderness Bill.	Please see general comment response #36
Brynja	Kohler	Minerals and Energy Resources	I am a professor of mathematics at Utah State University, and after careful calculations I have concluded that there is no justification for the plan to sacrifice 98% of wilderness-quality land to oil and gas drilling. The U.S. Geological Survey estimates that oil and gas deposits from this area would provide less than 4 days worth of our consumption.	Please see general comment response #101
Tyler	Kokjohn	Process and Procedures	I request that the following issues/concerns be addressed in the final Price RMP EIS and preferred action alternative: 1.Create preferred alternatives so as to reflect more faithfully the BLM charge to manage lands for sustained, long-term benefits and less to reflect the current policy to foster oil and gas development at the expense of a true multiple use strategy. 2.Write preferred alternatives to adopt a primary management stance that is protective of resources while avoiding ambiguous language and guidelines. 3.Ensure that the final EIS preferred alternatives take full account of specific issues raised by the BLM itself concerning the affected environment (DEIS 3.2.4) and environmental consequences (DEIS 4.2.5). 4. Ensure that the final preferred alternatives adopts a comprehensive transportation plan that safeguards from fragmentation and degradation all lands identified as wilderness study areas and/or potentially suitable for protection under the Redrock Wilderness Act... 2.Many of the alternatives seem vague or difficult to interpret... 3.Several DEIS issues seem not to be fully integrated into the preferred alternatives.. 4. Given that the Redrock Wilderness Act is proceeding through Congress, it seems vital to safeguard holdings from development or fragmentation until full wilderness protection is accorded or tracts are released from consideration.	Please see general comment response #35 and #36
Roxanne	Kopacka	Wilderness	The recent draft revision to the Price Resource Management Plan (RMP) fails to strike a balance between preservation, recreation, and energy development. Instead, it favors a few special interests at the expense of the American public. It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions. PLEASE protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon. Instead, support the balanced alternative, the Castle Country Heritage Proposal, that the Southern Utah Wilderness Coalition has submitted to you.	Please see general comment responses #10, #35, #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Paul	Koubek	OHV Route Identification	Management of Off-Road Vehicles: It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12 and #36.
Paul	Koubek	Process and Procedures	I am writing today to submit my comments regarding the Price Resource Management Plan draft alternatives and to endorse the Castle Country Heritage Plan. The Castle Country Heritage Plan is a balanced approach that	Please see general comment response #35

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			protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	
Ryan	Kovach	OHV Route Identification	It is far more important to leave the aesthetic prowess of this land untouched to exploitation and the use of motor vehicles (ORV's). I endorse the Castle Country Heritage Plan and hope you listen to my humble opinion.	Please see general comment responses #12 and #35
Daniel	Kozarsky	Minerals and Energy Resources	I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. Allowing companies to lease, explore for oil and gas, and ultimately develop these lands, ruins the stunning scenery of this unique area, degrades water quality, causes harmful soil erosion, endangers wildlife habitat, and destroys rare but essential riparian areas that should be protected.	Please see general comment response #101
Daniel	Kozarsky	OHV Route Identification	It is important that the BLM designate specific trails in the RMP and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment responses #19 and #132
Brian	Kraby	Minerals and Energy Resources	Your current preferred draft plan would open almost 98 percent of the lands that should be preserved as wilderness (but have not yet been protected by Congress) to drill pads, roads, waste pits and more. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development. Under your plan, only 584,128 acres of the area would be closed to oil and gas leasing and most of these acres are already protected from leasing by Congress. Instead of surrendering these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible damage that oil and gas drilling would entail. I also urge you to protect these lands from further harm from off-road vehicles activity. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment response #101
Brian	Kraby	Process and Procedures	Please consider implementing "Alternative C' as the best choice of action for the draft plan of 2.5 million acres managed by the Bureau of Land Management's Price Field Office and the 1.5 million acres of wilderness lands that are covered by America's Redrock Wilderness Act.	Please see general comment response #36
Dave	Krall	Transportation and Access	We need the above mentioned Airstrip Trailheads to access these areas of the state's recreational lands.	Please see general comment response #21
David	Krall	Transportation and Access	My family and I have been planning for a long time on flying into many of the airstrips you are considering closing and now that our ability and available time is promising to allow these flights, we find you are considering closing them. It is very disappointing to be among such a low impact user group and see such misdirected efforts against us. We'd like to know that these airstrips will be reasonably accessible to us in the future: Mexican Mountain Hidden Splendor Cedar Mountain Sage Brush Flat/Peter's Point Horseshoe Canyon Stone Cabin Gas Field Sagebrush Bench Cliffdweller Flat Gruvers Mesa	Please see general comment response #21

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			Sweetwater Reef Temple Wash.	
Ken	Kramasz	OHV Route Identification	I feel that our lands can be managed in a way that can accommodate a host of different recreational goals. I know that OHV use is a sore subject with many elitist recreation groups who would like to see the sport bared from public lands. I think this is selfish, shortsighted and unfortunate. We teach our children to share and that they can't always have things their way, why can't we share public lands. Our society is becoming more and more crowded and quality recreation is essential. We must remember that not everyone recreates the same way. I hope that a solution in which OHV use is recognized as a legitimate recreation can be reached. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	Please see general comment response #19, #31, #20, and #143
Al	Kreinberg	Recreation	After six years of drought and well below average flows on the Green, the BLM has decided to restrict the use of motors in Desolation and Gray Canyons? An outboard motor shared among the three boats on our trip would have enhanced our experience tremendously. Common sense dictates use of motors, especially in light of the increased demands on water in the Colorado drainage. The BLM needs to implement plans that account for reduced flows on the river. As anyone who has experienced the June swarms of mosquitoes it is IMPOSSIBLE not to be mauled by mosquitoes in peak season. Motors significantly reduce risk to vulnerable users of the resource. The proposed 90 motor trips a season sounds reasonable at first, but then how will these days be allocated? The BLM needs to provide details before making such a random allocation. Finally, I cannot understand the difference between emissions from two and four stroke engines. With all of the gas and oil drilling and concomitant impacts, a minimal number of outboards will have negligible impacts on the riparian environment. Anyone who has braved some of the wind storms and violent weather knows that the canyon can be difficult at times. Many rafters and users of the resource deserve the right to use motors if they so choose. I strongly recommend that these proposed restrictions on motorized travel not be implemented. The restrictions are not necessary to preserve the canyon experience for experienced rafters, they increase the hazards for commercial passengers, and they lack data to demonstrate that the current use of two stroke motors has any environmental impact at all. This is a bad idea made worse by the fact that it has not been given appropriate time for public comment.	Please see general comment response #34
Tom	Kreuser	OHV Route Identification	Please in the course of analyzing areas for ORV use, do not provide any "open areas"....trails and routes should be adhered to in order to keep over use of areas at a minimum. Please, do not designate any ORV trails in proposed wilderness study areas or on lands within the America's Redrock Wilderness Act.	Please see general comment responses #12 and #19
William	Krompel	Minerals and Energy Resources	The Carbon County Commission requests that the BLM add into the environmental impact statement and further into the new land use plan of both the Price and Vernal Field offices, language that will allow both Carbon and Duchesne Counties access and allowance at no cost to the counties, to extract hat might be located on federal lands for purposes of road paving and maintenance of country roads.	Asphalt reserves, tar sand, and oil shale are leasable minerals. It is BLM's policy to make these materials available to the public and local governmental agencies whenever possible and wherever environmentally acceptable (see Draft EIS Maps 2-37 through 2-41 for areas closed to mineral material disposal due to resource conflicts).

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				BLM sells mineral materials to the public at fair market value, but gives them free to states, counties, or other government entities for public projects. Asphalt, tar sand and oil shale are subject to the combined hydrocarbon leasing regulations, 43 CFR 3140, and cannot be disposed as a saleable mineral (mineral material) like regular sand and gravel. The counties would have to purchase leases for these materials according to the required leasing procedures.
Thomas	Kronke	Recreation	Dear sir it has come to my attention that you are working on developing a plan for the San Rafael Swell area. I urge you to not implement any plan that imposes more restrictions on OHV usage in this or any other area. I oppose all the management layers in the draft plan. I believe the chimney rock/ summerville, humbug trail systems should be left open, don't close any more trails or roads. I am 71 years old and the only way I can view and enjoy our scenic areas is by riding my ATV, I am unable to hike or bicycle or ride horses into these areas to enjoy them, so we do not need any more closures. The restrictions on camping and group sizes are totally unnecessary and will create a hardship on people like me. If you are having problems with operators who are abusing the system then crack down on them but don't place any more restrictions on the law abiding public, after all these are our lands.	Please see general comment response #19, #37, #80 and #81
Mary	Kubiak	Wilderness	I am writing to you to express my concern about development of wilderness area in this country. The 15,000 square miles of Utah's beautiful redrock canyonlands, all public land, belongs to all Americans. I understand that the Price Resource Management plan being written right now by the BLM will govern the fate of this area for the next 10 to 20 years. I strongly support the protection of our national heritage or wilderness lands for all generations to come. The short-range profit from mining and gas exploitation is minimal compared to what is being lost. Please protect the Utah Redrock Canyonlands from oil and gas drilling and over use of Off Road Vehicles.	Please see general comment response #36
Tom	Kuo	Wilderness	However, in reviewing the Price RMP, I am most disappointed to see the major deficiencies in designating additional areas for wilderness or wilderness study areas. I understand that BLM lands are mixed use, and even advocate for reasonable balance in policy. I still enjoy mountain biking and other non-wilderness activities and regularly engage in these activities in non sensitive lands. I also understand the need for a sensible approach to resource extraction. However, I believe that wilderness and protection of these precious lands is paramount. Instead of striking a sensible balance, the agency is unreasonably favoring resource extraction and motorized activities. This is short-sighted and ill-advised as it permanently impairs the land's unique qualities at the expense of today's citizens and those many years from now.	Please see general comment responses #36 and #116
Bill and Justine	Kusner	Minerals and Energy Resources	We are especially supportive of closing the entire San Rafael Reef citizen proposed wilderness area to oil and gas leasing, drilling and development.	Please see general comment response #101
Robert	LaBree	Minerals and Energy	Please help us to protect America's national heritage of wilderness lands for all generations to come. The short-range profit from mining and gas exploitation is minimal compared to what could be lost. This public land and the	Please see general comment response #101

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		Resources	80 other potentially affected areas belong to all Americans, and should be kept free of exploitation and preserved for everyone to enjoy.	
Alicia	Lafever	OHV Route Identification	Fully analyze each proposed motorized route to ensure that environmental and social impacts are minimized. Do not designate any "open areas" where ORV use is allowed without limitation. Please do not designate ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12 and #19
Alicia	Lafever	Process and Procedures	These lands are public and do not belong exclusively to ORV users and oil and gas developers... Please adopt the Castle Country Heritage Plan... Protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #35
Larry	Laffoon	Minerals and Energy Resources	The draft plan involves a total of 2.5 million acres managed by the Price Field Office of BLM. Some 1.5 million acres of that has been proposed for permanent protection as wilderness in "America's Redrock Wilderness Act" (H.R.1796). This plan seems to have been written by officials who know the price of everything, but the value of nothing. It is unconscionable to open most of the proposed wilderness to oil and gas drilling, as this draft plan does - fully two-thirds of the acreage proposed for wilderness in H.R. 1796. BLM should rewrite the plan to bar mineral leasing from all the proposed wilderness in H.R. 1796. BLM should leave those lands alone until Congress has decided their fate.	Please see general comment responses #18 and #36
Larry	Laffoon	OHV Route Identification	BLM should also revise the plan to bar off-road vehicles from the proposed wilderness areas in H.R. 1796. A huge growth in the use of ATVs, dirt bikes and 4x4s over the past 20 years has brought impacts and new vehicle trails all over the redrock desert. It is time to put on the brakes, and tell ORVs to stick to the 2,500 miles of vehicle trails in the Price Field Office area that are outside the proposed wilderness boundaries.	Please see general comment responses #12 and #19
Jason	Laflamme	OHV Route Identification	I have been visiting the San Rafael Swell and surrounding areas for over 10 years now. I am an avid canyoneer and backpacker. Recently, I find myself going to destinations south of your area to recreate because the ORV traffic has severely compromised what your area has to offer for me. Let me proffer up some recent ORV experiences: * Five years ago, I have had a stream of 12 ATVs go by as we were coming out of lower Eardley Canyon in Straight Wash. Children as young as eight appeared to have their own ATV in this chain. We stood out of the way as the procession passed us each rider giving its perfunctory wave. Day ruined.... * Two years ago, we stayed just inside the reef near temple junction on Memorial Day weekend. What an appalling site to see that many camping trailers and ORVs gather at that large lot near Temple Junction. We were disturbed almost every hour by an ATV whipping by our camp; they last of which came through just after midnight and the first in the morning was at 5:30 A.M. Day ruined....One can only imagine the astronomical amount of damage this one group caused on that one weekend... * Several times I have done the arduous overland walk to the head of Moonshine Canyon in the San Rafael Desert only to find that ORVs have driven directly to the head of the narrows. One time a Jeep was parked within six feet of the drop into the narrows. Day ruined..... * Barring the Mexican Mountain Area, one can hardly find a suitable backpack destination in all your administered area because the ORVs have penetrated so deeply. The predominately Mormon beliefs of most of these ORV riders allows them rip and tear up this countryside, which they believe will come to an end soon. The end might in fact be the end of other visitors to this area. I am	Please see general comment response #19

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			hoping that your area, like areas to your south, will attract generations of recreationist to come. However, from what I have seen it is likely that even my children will not put your area on their destination list.	
R. Wade	Lambert	OHV Route Identification	Regarding off road vehicle travel, I would like to see such travel limited to existing roads only, provided that those roads were properly designed and engineered to limit erosion and degradation of the land and resources. Roads that have been poorly or improperly designed should be removed. Roads that inhibit wildlife corridors or fragment or damage habitat should also be removed and the land recontoured. Roads that are located adjacent riparian zones or perennial streams should also be de-commissioned. Such roads threaten water quality and should be prime candidates for removal. Further, all riparian areas should be protected from development. Please do not designate any open areas where ORV use is allowed without limits. Any vehicle travel should be restricted to quality roads that are well maintained. Cross country travel should be illegal. Any trails for ATV or motorcycle use should be well outside wilderness quality lands in dedicated use areas. Illegal cross country motorized vehicle travel should be met with the harshest legal penalties. Please, no new roads, or ATV/ORV trails in wilderness quality lands, either WSA or former WIA lands.	Please see general comment responses #12 and #19
R. Wade	Lambert	Wilderness	Prevention is the best cure. Providing all wilderness quality land with continued interim protection is the best long-term way to prevent both the short and long-term impairment of the resources you are entrusted with. Further, wilderness protection is the most cost effective way to manage public lands and stretch already tight budgets. Wilderness protection (with eventual wilderness designation) of those lands will provide future generation (with a legacy they will praise you for. Please do not squander our National Treasures by approving a sub-standard RMP revision.	Please see general comment responses #36, #109, and #147
Wade	Lambert	Cultural Resources	Protection of Legacy Resources: Historical, Archeological and Paleontological sites should be protected as well. No developments should be allowed near such sites or potential sites. Rock art sites should be left intact with nothing to draw attention to such sites including signs, posts or fences. Native trees and shrubs should be planted at vulnerable sites to discourage attracting those persons that would vandalize or damage such sites. Information regarding such sites should be given only to those who ask and are deemed responsible and respectful. Also, endemic flora and fauna should be vigilantly guarded and protected along with their habitat, so they do not end up on endangered or threatened lists further stretching tight budgets.	Please see general comment responses #9 and #91
Wade	Lambert	Livestock Grazing	Grazing: Permits for grazing should be allowed only in areas where such allotments are sustainable and past overgrazing has been properly mitigated. In areas where desertification has already occurred as a result of over-grazing damage, grazing should be permanently suspended. Also, in areas that receive less than 6” rainfall per year, grazing should be suspended. If areas receive less than 6” of rain in one year, grazing should be suspended until multiple years of plus 6” per year rainfall restores vegetation. Numbers of animals per permit should remain well within sustainable limits. Permit holders should also be required to keep livestock away from stream, river and wash banks, riparian zones and perennial streams and rivers. They should also stay away from and out of damaged or eroded areas. If permit holders fail to follow these guidelines, then their permits should be revoked and future permits heavily scrutinized. Costs of grazing permits should reflect management costs and not be subsidized by the public.	Please see general comment response #33
Wade	Lambert	Minerals and Energy Resources	NO OIL AND GAS DEVELOPMENT ON WILDERNESS QUALITY LANDS! First, I want these lands protected from ANY development as much as possible. I want ALL wilderness quality lands, including WSA and former WIA lands kept in their current pristine, natural state. The limited amount of oil and natural gas and other minerals found within those wilderness quality lands are not worth ANY damage that such development would incur to those lands. Utah is not Saudi Arabia, Oklahoma or Texas and the oil and gas	Please see general comment responses #18 and #101

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			resources are ridiculously low and the wilderness resources are not worth compromising. Even if these lands were to contain billions of barrels, we still owe it to future generations to protect these unique lands from all such developments. Future technologies and clean alternative sources of energy will vindicate any such need for the limited amounts of energy resources found in these pristine lands. The pristine landscapes, wildlife resources, archeological, pale ontological and ecological treasures and values far exceed any mineral resources to be found on these lands. Contrary to the Bush administration's edict that oil and gas take precedence over other resources - I ask that the small amounts of oil and natural gas NOT be given consideration on these lands. These lands belong to all the Citizens, not just the oil and gas companies.	
Wade	Lambert	OHV Route Identification	Road Decommissioning Should Be a Part of this RMP revision: Regarding off road vehicle travel, I would like to see such travel limited to existing roads only, provided that those roads were properly designed and engineered to limit erosion and degradation of the land and resources. Roads that have been poorly or improperly designed should be removed. Roads that inhibit wildlife corridors or fragment or damage habitat should also be removed and the land re-contoured. Roads that are located adjacent riparian zones or perennial streams should also be de-commissioned. Such roads threaten water quality and should be prime candidates for removal. Further, all riparian areas should be protected from development.	Please see general comment responses #12 and #19
Wade	Lambert	OHV Route Identification	Vehicle Travel / Travel Plans: Please do not designate any open areas where ORV use is allowed without limits. Any vehicle travel should be restricted to quality roads that are well maintained. Cross country travel should be illegal. Any trails for ATV or motorcycle use should be well outside wilderness quality lands in dedicated use areas. Illegal cross country motorized vehicle travel should be met with the harshest legal penalties. Please, no new roads or ATV/ ORV trails in wilderness quality lands, either WSA or former WIA lands.	Please see general comment responses #12, #19 and#36
Wade	Lambert	Recreation	Recreation: Though only 2-4% of those who recreate on BLM lands use ATV's, they cause an inordinate amount of damage to those lands. It is virtually impossible to travel Price BLM lands without seeing such adversely affected areas. Are scarred hillsides to be the norm on these lands? Is erosion and desertification the future for the Price BLM lands? Will all perennial streams and washes end up muddy lifeless bogs and eroded wastelands like the areas that surround Factory Butte and the Muddy and San Rafael rivers? Certainly it isn't too much to ask that wilderness quality lands be protected from this onslaught? Please protect these lands! For the flora, the fauna, the legacy resources, clean water and air and mostly, for future generations! Non-motorized recreation enthusiasts encompass the majority of BLM land users and should be given priority on these lands, especially since the majority of BLM lands in the state are already open for motorized use. Please allocate resources accordingly and protect the remaining wilderness quality lands within you jurisdiction.	Please see general comment responses #15 and #36
Wade	Lambert	Wild and Scenic Rivers	Wild and Scenic River Designation: All perennial streams and rivers should receive wild and scenic river designation and remain free of dams and constrictions. Also, developments of any type should be restricted to areas well outside riparian zones.	All streams in the Price Field Office planning area were given consideration for their potential designation as a Wild and Scenic River. Appendix C of the Proposed RMP/Final EIS fully discloses the review and evaluation process for determining which are eligible and suitable for such designation. Furthermore, restrictions in riparian zones have been addressed in the RMP as described below: Natural Springs: Buffer zones of no surface disturbance and/or occupancy would be maintained

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				around natural springs to protect the water quality of the spring. The distance would be based on geophysical, riparian, and other factors necessary to protect the water quality of the springs. If these factors cannot be determined, a 660-foot buffer zone would be maintained (Alternative A, B, C, and D). Wetlands/Riparian Area: Allow no new surface disturbing activities within 100-year flood plains, public water reserves, or 100 m (330 ft) of riparian areas. Recreational facilities designed so as not to impede the function of the floodplain would be permitted. Exception may be authorized by the Authorized Officer if it can be shown that the project as mitigated eliminates the need for there restriction (Alternative A).
Burt	Lamborn	Alternative Maps	Also, I am distressed to learn that public input on this issue has been ignored. Specifically, the Chimney Rock/Summerville Trail System and the Arapeen Trail connector routes were mapped and submitted by the local OHV community early on in the process. Why do these trails not appear on any of the Maps in the Appendix? The document describing the proposed OHV management needs to be clear and self-contained so that the public can easily understand it and provide meaningful comments. For example, the text states that the Chimney Rock/Summerville trail system is proposed open, yet on the preferred alternative OHV map it's not included. Which is it?	Please see general comment responses #20 and #31
Burt	Lamborn	OHV Route Identification	Another example - what are we supposed to think when paved roads (typically illegal for unlicensed OHVs) are designated as OHV routes on the map? My motorcycle is licensed for the street, but will I be able to take my son on his dirt bike on those routes? (And yes, he's been through the training program and has his card!) The maps need to be updated to accurately show the OHV designations for each alternative, or what's the use of getting public input?	Please see general comment response #78
Burt	Lamborn	Recreation	There is no rationale for the proposed limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS.	Please see general comment responses #37 and #81
Burt	Lamborn	Recreation	Don't change the current group size limits.	Please see general comment response #81
Burt	Lamborn	Transportation and Access	All existing roads and trails (including single-track motorcycle trails) should be kept open for vehicle use.	Please see general comment response #10
De Vee	Lange	Minerals and Energy Resources	Considering your opening wilderness areas to oil and gas drilling, isn't this pandering to special interests -and would the questionable results be worth the price of destroying habitats that can never be replaced?	Please see general comment response #101
De Vee	Lange	OHV Route	There is another way to balance the needs of all recreational users with the adoption of the Castle Country	Please see general comment responses #12 and

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		Identification	Heritage Plan and I urge your office to consider the merits of this document.	#35
Don	Lansberry	Transportation and Access	As you review your management philosophies, I respectfully ask you to consider preserving all backcountry aircraft landing strips in the wilderness. I think there is room for all to enjoy. A person on foot can only enjoy the beauty and vastness of the wilderness when they reach an overlook point, but many times that is a limited view. The view of the wilderness from the air is second to none. I have had a pilot's license since 1960. I grew up in the Los Angeles area and have flown over and enjoyed areas that even today have not been viewed or touched by humans on the ground. The Utah Wilderness is even more vast in that regard. Although they cause some noise pollution, light airplanes cause less erosion and in many cases you can barely determine an airplane has landed there. The people that belong to the Utah Back Country Pilot's association are a very responsible group. They collectively go to great lengths and personal expense to preserve to wilderness areas they visit. The landing strips I am specifically referring to are Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat/Peter's Point, but also am concerned about Horseshoe Canyon, Stone Cabin Gas Field, Sagebrush Bench, Cliffdweller Flat, Gruvers Mesa, Sweetwater Reef, Temple Wash, and there may be others. Some of these landing strips have been here for many decades and have been no cause for concern. There are those who, if they had their way, wouldn't allow any human access. These strips need to be specifically named in the new Resource Management Plan. To not mention them by name might lead to all kinds of interpretations. Lastly these landing strips are a vital resource for things like emergency landings and fire management and other such things	Please see general comment response #21
Clovis	Lark	Minerals and Energy Resources	The auctions have been for the benefit of a handful of oil and gas corporations. While our nation stands at the edge of an energy crisis and oil prices are soaring, the actions being taken by the BLM do not benefit the future. Oil reserves in the Book Cliffs are publicly stated to amount to 11 days of US national usage. Gas reserves are estimated publicly to be sufficient for slightly over 250 days' national usage. This means that serious detrimental development of the Book Cliff region, of lasting impact, is for benefit of less than a year. Yet, once these benefits have been exhausted, the damage remains, as is all too easily seen further south where the remains of abandoned uranium mines dot the area around Temple Mountain, Moab (where the Atlas Mill abandoned site seeps contaminants into the Colorado River) and elsewhere.	Please see general comment response #18
Clovis	Lark	Minerals and Energy Resources	Prior to the closing of the public period for comment, permanent changes were already in place; possession of the public's land by oil and gas companies was already underway.	Oil and gas leasing and other resources uses of the public land continued during the planning process in accordance with the previous land use plans and existing rights.
Clovis	Lark	Minerals and Energy Resources	The BLM has begun auctioning off large tracts of this land to special interests, without the input of those affected (indeed, those affected are not in Carbon or Emery Counties, they include all who live down stream, all who travel through the area, all who pay for managing and receiving the wealth of this region). The auctions to special interests for exclusive usage violate the premise of national public lands which are for ALL, not a few.	A land auction is not contemplated under any of the alternatives being considered in detail. The EIS evaluates options in detail to consider a balanced approach which provides opportunities for mineral exploration and production in the public interest as required by the Mining Law and Mineral Leasing Act, while ensuring protection of other resource values. The management actions in the RMP are designed to offer management flexibility to allow for

First Name	Last Name	Category	Comment	Response
				acceptable levels of mineral development while ensuring that resource values and uses are protected.
Clovis	Lark	Minerals and Energy Resources	While our nation stands at the edge of an energy crisis and oil prices are soaring, the actions being taken by the BLM do not benefit the future. Oil reserves in the Book Cliffs are publicly stated to amount to 11 days of US national usage. Gas reserves are estimated publicly to be sufficient for slightly over 250 days' national usage. This means that serious detrimental development of the Book Cliff region, of lasting impact, is for benefit of less than a year. Yet, once these benefits have been exhausted, the damage remains, as is all too easily seen further south where the remains of abandoned uranium mines dot the area around Temple Mountain, Moab (where the Atlas Mill abandoned site seeps contaminants into the Colorado River) and elsewhere.	Please see general comment response #18
Clovis	Lark	Minerals and Energy Resources	Prior to the closing of the public period for comment, permanent changes were already in place, possession of the public's land by oil and gas companies was already underway	BLM recognizes valid existing rights and therefore, existing oil and gas leases can be developed under the terms and conditions of the leases.
Clovis	Lark	Soil, Water and Riparian	The waters that originate in the state or flow through it serve great communities in Arizona, Nevada and California. Polluting these waters would jeopardize these communities.	Please see general comment response #76
Clovis	Lark	Soil, Water and Riparian	After the profits are gone from developing the oil and gas in this region, will we accept the pollutants that will make their way down stream, via the Green and its tributaries? If New York City and Philadelphia are permitted to stave off development adversely affecting their water supply should Utah and the greater Southwest be any different.	Please see general comment response #67 and Appendix G of the Proposed RMP/Final EIS.
Gail	Larrick	Wilderness	The San Rafael Swell and other wilderness areas of Southern Utah have given me a great sense of the healing and joy of the silence and beauty they offer. Allowing mineral rights to destroy this sanctuary cannot be undone; it is at best an example of environmental short-term thinking.	Please see general comment response #109
Brett	Larsen	OHV Route Identification	I have spent many days out in the desert and my father spent summers out there surveying it for oil companies as a young man many years ago. I would hate to see it closed off to visitors, trucks, jeeps, ATV's or motorcycles. Better marking of designated routes, training Pamphlets to teach responsibility of sensitive areas [is needed].	Please see general comment response #19
Lane	Lasrich	Minerals and Energy Resources	I urge the Bureau of Land Management to allow for environmentally responsible oil and gas leasing and development.	Please see general comment response #18
Karen	Latvala	OHV Route Identification	Protect fragile habitat and cultural resources. Specifically the BLM should craft a reasonable balance between motorized and non-motorized travel; include an effective trail enforcement plan; restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act; and restrict ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	Please see general comment responses #12, #15 and #36
Miki	Laws	Minerals and Energy Resources	I strongly request you to protect all the areas in the America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment responses #36 and #101
Miki	Laws	OHV Route Identification	Please do not designate ORV trails on lands within America's Redrock Wilderness Act or in existing wilderness study areas like Sids Mountain. Also, I request strongly that you do not designate any 'open areas' where ORV use is allowed without limitation.	Please see general comment responses #12 and #36
Clark	Layton	OHV Route Identification	In my opinion, the proliferation of off-road vehicles poses the greatest threat to our wilderness resources than any other potentially harmful use in the foreseeable future. There are existing roads that can offer recreation outlets for carefully- managed ORV use.	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			These areas should be marked for such use, with posted restrictions, while all other areas should be off limits. Only those areas designated through a careful planning, EIS and public hearing process should be offered for ORV use. Otherwise it should be understood that all other areas are strictly non-use.	
Cynthia	Leigh	Minerals and Energy Resources	It is my further understanding that the plan fails to protect 98% of wilderness quality lands from oil and gas development. Please do not offer proposed wilderness lands to oil companies.	Please see general comment response #101
Jerry	Lemieux	Socioeconomics	Multiple use means industry, as well. I believe you are aware of how critical the energy industry is to the economy of Emery County. Eastern Utah has a long and rich history with respect to energy production. Whether it be the coal and natural gas of today, or the uranium extraction of yesterday, Eastern Utah has to some degree always relied on the extractive industries for economic vitality. There are those who believe conservation, recreation, and energy production are mutually exclusive; I dismiss this notion. Industry and energy development are needed to sustain our way of life, state budget, county tax revenues, and tourism infrastructure. While the environmental voice is usually the loudest, what percentage of the population do they represent? I encourage the BLM to reject the environmental approach and philosophy that would prohibit our economy from production efficient and reliable energy. These public lands should provide Americans with the recourses that will continue to make our lives comfortable. Without energy, we lose everything that makes living in America great: being warm in the winter; cool in the summer; lights when it's dark; emergency services when we are sick, unprecedented global mobility and every other luxury afforded to the American way of life. NEPA requirements for the BLM to consider socioeconomic consideration when making land management decision. As you are aware, Eastern Utah is the poorest area in Utah and can ill afford limiting access to our natural resources. While many view the West as a place to recreate (a national playground) there are many who live in this region and rely on the vast energy reserves stored here by mother nature. Those who are relentlessly critical of the extractive industries should remember that in 1999 the average wage of those employed by extractive industry was $65,000. Much of these monies stay in the region showing up in the form of economic vitality. Sustainable wages like these are desperately needed in Eastern Utah. I have seen first hand that service industries rely on the extractive industries. Our restaurants, convenience stores, OHV interests, and gas stations would struggle in the absence of industry expenditures. A successful and thriving economy allows our local municipalities to invest in infrastructure allowing us to promote tourism in our area. Please adopt RMP charters using our regional economic situation as a nucleus for the priorities you highlight in the final RMP decision. I am insulted by the fact that many if not most of the board of directors of SUWA (the group primarily responsible for chipping away at the doctrine of multiple use) are no even from Utah. How can a group who doesn't understand the nuances of our Eastern Utah culture feel comfortable making decisions that could devastate the lives of Eastern Utah business persons? I appreciate and welcome recreationists of all types as they are also valuable to our economy, but again resent the assumption that public lands exist not only for annual recreation. I would like the BLM to help send the message that Eastern Utah is not simply a playground for the nation, but should be recognized as a place where families and communities struggle to prosper and grow.	Please see general comment response #132

First Name	Last Name	Category	Comment	Response
			Balancing management strategies to accommodate varying interests is needed, but I support Alternative A inasmuch as sustainable high paying jobs will yield the best future for our communities and economies.	
Virginia	Lemine	Minerals and Energy Resources	According to the Natural Resources Defense Council the Bureau of Land Management has released a draft land use plan to open nearly 100 percent of the areas wilderness-quality lands to oil and gas drilling... We must preserve these lands no allow damage to oil and gas drilling.	Please see general comment response #101
Kenny	Leo	Livestock Grazing	Efforts need to be made to insure future grazing on grazing permits on public lands.	Please see general comment response #33
Angela and Karl	Leonard and Odom	Cultural Resources	We are emailing to state that we are opposed to any development in Utah's Nine Mile Canyon. This canyon is a sacred site to Native American people whose needs and rights continue to be overlooked by the vast majority of this country and it's government. The petroglyphs should also be carefully preserved. The RMP needs to protect this sacred site.	Please see general comment response #9
Tom	Lepry	Minerals and Energy Resources	Thank you for the opportunity to comment on the Price Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS). I support the continued development of oil and natural gas in the planning area covered by the Draft RMP/EIS. However, the Preferred Alternative as written fails to lay out a basic foundation for future land use decisions by broadly imposing restrictive measures to limit industry's ability to access lands for environmentally responsible oil and gas leasing, exploration and development. Specifically, I request that the Preferred Alternative be adjusted to address the following: BLM needs to redraft the Reasonable Foreseeable Development to comply with BLM policy and realistically address the development potential in the planning area.	Please see general comment response #51
Tom	Lepry	Socioeconomics	BLM needs to fully analyze the socioeconomic impact of the restrictions placed on oil and natural gas development within the planning area.	Please see general comment response #132
Dave	Levenger	Special Status Species	Adhere to and use the recommendations found in the UDWR Strategic Management Plan for Sage Grouse (UDWR Publication 02-2002). Additional management strategies may be incorporated when the BLM Sage-Grouse Habitat Conservation Strategy is signed. Add: Plans, guidelines, and protocols must not be developed or implemented without the full involvement of the County and full public disclosure. All recovery plans must provide for indicators to track the effectiveness of the plan and identify at what point recovery is accomplished.	Please see general comment responses #55 and #64
Abe	Levy	Wilderness	I am sure that you understand that the Red Rock Wilderness Act before the US Congress would designate some of this land as wilderness. This RMP would preempt the Congress from doing so, and therefore represents an attempt at preemption of future federal law. While this is certainly not illegal, I do consider it shameful.	Please see general comment response #36
Pat	Levy	Process and Procedures	As a travel agent, I have sent dozens of my clients to visit Utah wilderness in the last 20 years. My family and I have visited there over 10 times ourselves, specifically to visit wilderness. I am strongly in support of the Castle Country Heritage Plan and urge this to be an integral part of the Price RMP. While understanding that BLM property cannot be 100% wilderness, the almost total absence of wilderness protection in the current Price RMP is disgraceful.	Please see general comment responses #35 and #36. Eleven areas encompassing about 526,960 acres would be managed to protect wilderness character under all of the analyzed alternatives. Management under Alternative E would protect all areas with wilderness characteristics.
ANN	Libengood	OHV Route Identification	I am also concerned about the multiple layers of management that can negatively affect OHV travel. Areas of Critical Environmental Concern (ACEC), Recreation Opportunity Spectrum (ROS), Special Recreation	The Proposed RMP/Final EIS evaluates a range of alternatives in detail to assure a balanced approach

First Name	Last Name	Category	Comment	Response
			Management Areas (SRMA), and Extensive Recreation Management Areas (ERMA) all have management objectives that will negatively impact OHV recreation. The draft does not adequately inform the public which roads and routes will be closed because of the various management levels.	that allows BLM to protect the resources and resource uses is considered. The management actions in the Proposed RMP are designed to ensure that resource values and uses are protected while allowing for acceptable levels of open route designations. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show the OHV route designations for each of the alternatives analyzed in detail. Also see general comment responses #37 and #39.
ANN	Libengood	OHV Route Identification	The Draft states that the Chimney Rock/Summerville Trail system will be designated open, but the Preferred Alternative OHV route Designation Map (Map #2-57) does not show this. It fosters distrust for readers who want to see accurate maps of the agencies intentions. The BLM needs to produce better maps for the DEIS that provide true representation of what areas and trails will be open to OHV travel.	Please see general comment responses #20 and# 31
Ann	Libengood	Recreation	I am concerned about the proposal to restrict the number of people in a group for each Recreation Opportunity Spectrum. This is an unprecedented policy proposal, which has the potential to negatively affect family groups or club outings. The BLM should drop this proposal from the Final RMP and stay with the current 50 person group limit. I am also concerned about the multiple layers of management that can negatively affect OHV travel. Areas of Critical Environmental Concern (ACEC), Recreation Opportunity Spectrum (ROS), Special Recreation Management Areas (SRMA), and Extensive Recreation Management Areas (ERMA) all have management objectives that will negatively impact OHV recreation. The draft does not adequately inform the public which roads and routes will be closed because of the various management levels . For example, in the San Rafael Swell several designated routes go through areas that have an ROS of Semi Primitive Non-Motorized. The BLM has closed other routes in Primitive or Semi Primitive Non-Motorized ROS. The ROS designation should be changed to Semi Primitive Motorized in those affected areas. Map # 2-56, OHV Route Designations, Alternative D does not show the designated routes for the San Rafael area. The designated routes from the San Rafael Route Designation Plan need to be included on the maps provided by the BLM in the Draft. This has the potential to breed distrust of the agency by the reader of the draft.	Please see general comment responses #31,#37, #50 and #81
ANN	Libengood	Recreation	I am concerned about the proposal to restrict the number of people in a group for each Recreation Opportunity Spectrum. This is an unprecedented policy proposal, which has the potential to negatively affect family group or club outings. According to the analysis conducted for the San Rafael Route Designation Plan. OHV use under current use levels causes no significant impacts. The BLM should drop this proposal from the Final RMP and stay with the current 50 person group limit.	Please see general comment response #81
Lloyd	Liebetrau	OHV Route Identification	I have served on the Colorado State Trails Committee and am currently serving on the State OHV committee. I'm an avid OHV user and enjoy Trail riding along with my wife and friends. There are few recreations that offer the family benefits of trail riding. I'm asking you to not close existing trails or allow second layers of travel management plans to close them. These trails do a great job of serving the publics need in enjoying the outdoors. Serving on the State Trails	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
			Committee and the state OHV committee my responsibility and existing land managers has always been to find ways to help solve differences that occur on trails. The last result is to close any trail, especially for the benefit of 1 user group over another. I'm asking you to not close existing trails in the proposed management plan. Please keep me advised of the progress of this plan. OHV recreation is a very important way of being able to see the back country of America.	
Lloyd	Liebetrau	OHV Route Identification	I'm asking you to not close existing trails or allow secondary plans to close these trails. These trails do an excellent job of serving the public's need for enjoyment of the outdoors. While serving on the State Trails committee and the State OHV committee, my responsibility was staying in step with land managers is to find solutions to differences that occur on the trails. The last result is to close a trail, especially for the benefit of another user group over another. OHV recreation is a very important way of being able to see America's backcountry. The following issues of concern: Issue: BLM states the San Rafael Route Designation Plan will be incorporated into the new management plan, but does not tell the public that other management "layers" will make significant road and trail closures. Comment: The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan... Issue: BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. Comment: Tell the BLM that you will not tolerate this kind of deception. The OHV community deserves to be treated with respect. Tell the BLM that their maps must be updated to accurately portray the OHV designations outlined in each alternative. Issue: BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. Sadly, most of the 'green lines' on Map 2-NUMBER HERE area actually closed to unlicensed OHV use. Comment: Ask the BLM how many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use?... Issue: Popular OHV Trail Systems must remain open Comment: Tell the BLM that all of the Chimney Rock/Summerville and Humbug trail systems should be left open. Ask them to designate links to the Arapeen Trail System. Tell them to keep all existing roads and trails open for vehicle use.	See general comment responses #,19, # 20, #31 and#78
Lloyd	Liebetrau	OHV Route Identification	Issue: BLM is proposing severe group size limits. Group size limits puts clubs, large families and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. Comment: There is no justification for the kind of group size limits puts clubs, large families, and the American Public under unfair and arbitrary restrictions. According to analysis conducted in the SRRDP, OHV use under current use levels causes no significant impacts. Comment: There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50-vehicle limit and not impose National Park style management on public lands.	Please see general comment response #81
Lloyd	Liebetrau	Process and Procedures	BLM has proposed many overlapping management "layers" in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, are not drawn along any recognizable geographic boundary making compliance virtually impossible. BLM needs to know that the recreating public will not tolerate overly restrictive an impossible to understand restrictions on camping and vehicle recreation. The BLM needs to oppose all the management "layers" outlined in the draft plan.	Please see general comment response #37
Toni	Liechty	Wilderness	As a parks and recreation professional, I am keenly aware of all the conflicting interests regarding this wilderness area, particularly regarding those using ORVs and those opposing them. I am also aware that some may desire to explore these areas for fossil fuels, but the fact is that fossil fuel will be quickly used and gone, and if we destroy the natural and historic wonders that these areas contain, they will be lost forever. As a Utah citizen, I am asking you to do what you can to protect Utah's precious wilderness areas for all of us and more importantly for generations to come.	Please see general comment response #109

First Name	Last Name	Category	Comment	Response
David	Lien	Minerals and Energy Resources	Protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #101
David	Lien	Process and Procedures	I would like to submit my comments regarding the Price Resource Management Plan draft alternatives and to endorse the Castle Country Heritage Plan. The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes, and other off-road vehicles, but also includes reasonable opportunities for these activities to take place.	Please see general comment responses #35 and #36
David	Lien	Wilderness	we need more designated Wilderness Areas and Roadless Areas to let us escape from the noise, pollution, traffic and trappings of civilization that are slowly but surely degrading our way of life.	Please see general comment response #120
David	Lien	Wilderness	I am writing to urge you to protect all roadless and wilderness quality lands from any form of energy development, mining, logging, new road construction, ORVs, etc., in the new Price Resource Management Plan (RMP). Few wild, roadless areas remain on our BLM and other public lands. It's time we drew a line in the sand and said enough is enough! These wild areas should be protected completely, and preserved in their natural state, as wilderness...we need more designated Wilderness Areas and Roadless Areas to let us escape from the noise, pollution, traffic and trappings of civilization that are slowly but surely degrading our way of life... Protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #36
Dan	Lilja	Transportation and Access	I'm writing this message as a letter-of-support for the recreational airstrips in the Price BLM district. As a pilot from Montana I've landed at half a dozen of the strips in your district. I think these are a great asset to Utah and am glad to see you included them in your preferred alternative in the RMP. As well as offering recreational opportunities they also provide a safe landing area for emergencies such as a landing I made at Dolores Point a couple of years ago. Thanks for recognizing the importance and value of these backcountry airstrips.	Please see general comment response #21
Sandra	Lillie	Process and Procedures	Please consider the Castle Country Heritage Plan. As I understand it, oil contained beneath the Redrock Wilderness is minimal, and surely would not be worth destroying one of the most beautiful and inspiring places in the United States.	Please see general comment response #35
Marcia	Lincoln	OHV Route Identification	In addition, I oppose allowing ATV use there. Many ATV riders have proven themselves to be poor caretakers of the land. They cause erosion and habitat destruction. The noise created by ATVs is disturbing to other users and destroys the tranquility of area.	Please see general comment response #19
Rebekah	Lindberg	Minerals and Energy Resources	Alternative D is an unbalanced use of lands, but I attended the scoping meeting in 2002 in Salt Lake City and among participants at the meeting I attended, oil and gas leasing was not one of the uses folks were promoting for this area. Furthermore, with the amount of oil that could be garnered (1% of the United States oil needs, lasting about 4 days), it seems completely ridiculous to tear up our beautiful public lands for greedy corporations. Areas such as Nine Mile canyon with valuable archeological resources should simply not be open for leasing. Along with removing oil and gas leasing from Nine Mile Canyon, other pristine areas or areas where recreational use is high, such as Desolation Canyon, Turtle Canyon, Mexican Mountain, the San Rafael Reef, and Eagle Canyon should not have oil and gas leasing. Finally, I feel that the oil and gas limitations are not stringent enough and that more areas should be designated with major constraints such as no occupancy leasing, particularly the areas that I have listed above.	Please see general comment responses #18 and #36
Rebekah	Lindberg	OHV Route	Under Alternative D the BLM will only close 400,000 acres to OHVs; this is an amount that is less than what is actually designated as WSAs. How does this reflect a fair and balanced plan to meet all users needs? In fact,	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
		Identification	since OHVs are known to displace hikers, bikers, and horseback riders (yet these same users do not displace OHV users), there should actually be more acres not open to OHV use than open - if the plan were to be balanced for all types of recreation use. I highly recommend a closer look at the Swell Travel Plan that is being incorporated into this RMP and suggest that more parallel routes, routes with no specific designation, and routes such as those in Sids Mountain WSA, including the Devil's Racetrack and Coal Wash, along with Five Miles of Hell and Behind the Reef Road be closed. I ask that the BLM consider reducing the amount of roads designated as open for OHV use in this alternative.	
Rebekah	Lindberg	Wildlife and Fish	At a minimum, the RMP needs to have the flexibility to adapt to circumstances and varying conditions. The ability to allow local management personnel to make exceptions and amendments definitely needs to be available... It is our assumption that the table in Appendix 8 is incorrect, and NSO would not be imposed in Alternative D for wildlife conservation, except in small, very critical areas... We propose that the RMP should set an expectation and schedule to develop a process to waive or modify seasonal closure stipulations when the cumulative impact of stipulations for different species would significantly hamper oil and gas development... these inconsistencies should be corrected.. neotropical birds and white footed prairie dogs. We believe that the BLM should defer decision on habitat management options for these species to a later date... We believe that season restrictions of lower value habitat will not achieve the optimum multiple-use outcome... We propose that the RMP should set an expectation and schedule for development of best management practices for exception, modification, and waiver processes, and that the RMP specify that these best management practices be developed in concert with industry, other participating agencies, and other key stakeholders. We believe there may be numerous reasons to grant waivers to seasonal closure... We propose that the RMP should set an expectation and schedule for development of best management practices for environmental analysis... We propose that if any habitat is designated NSO, then exception, modification, and waiver processes should be developed in concert with industry, other participating agencies, and other key stakeholders...	Please see general comment response #41
Randy	Lindsey	Recreation	All of this area that has previously been multiple use should remain that way. My idea is that most of the far remote areas will never be seen or used by hikers and can only be enjoyed by people by motorized means.	Please see general comment responses #1 and #15
Donald	Lipmanson	Minerals and Energy Resources	Unfortunately, the present proposal leaves far too much land remote land - included within the proposed Redrock Wilderness Act - exposed to oil and gas exploration, leasing and drilling, especially the Price Wilderness Area, the Desolation Canyon roadless area and Labyrinth Canyon At a time when this county needs to start weaning itself from petroleum dependency, BLM is proposing oil and gas development that offers very little supply yet undermines wildlife habitat and eliminates many thousands of acres where people currently can find a measure of solitude.	Please see general comment response #101
Donald	Lipmanson	OHV Route Identification	The plan also leaves too much land open to off-road vehicles, the noise and environmental damage (especially to riparian areas and cryptobiotic soils) from which really undermine the value of remote lands to hikers and other people who use BLM land for non-motorized recreation and also reduce wildlife habitat.	Please see general comment response #19
The	Lisenbee	OHV Route Identification	I am very much in support of the BLM in preventing off-road vehicles (ORV's) from encroaching on it.	Please see general comment response #19
The	Lisenbee	Wilderness	I'm asking the BLM to do all you can in preserving our Central Utah Wilderness.	Please see general comment responses #36 and #109
Christopher	Lish	OHV Route Identification	The map of the RMP route plan shows roads that go into every Wilderness Study Area and Utah Wilderness Coalition proposed wilderness area in the northern Price district. By designating every single track in the sand as	Please see general comment response #12

First Name	Last Name	Category	Comment	Response
			open to motorized vehicles, the BLM fails to protect cultural sites, riparian corridors, delicate desert soil, wilderness study areas, and lands within the proposed America's Redrock Wilderness.	
Maria	Little	Minerals and Energy Resources	The U.S. Geological Survey estimates that oil and gas deposits under America's redrock wilderness would amount to less than a week's worth of oil and less than four weeks' worth of natural gas.	Please see general comment response #101
Maria	Little	Process and Procedures	There is another way and a better one. It's possible to meet the needs of preservation, recreation, and energy development simultaneously. For example, a Wilderness Society partner group, the Southern Utah Wilderness Alliance (SUWA) is now preparing an alternative to the BLM's preferred course. Known as the Castle Country Heritage Proposal, the plan protects all the lands proposed for wilderness under America's Redrock Wilderness Act from oil and gas leasing and development and from off-road vehicle use. But it still allows for energy development on other lands in the resource area, and it leaves 2,862 miles of trails open to motorized vehicles. This land belongs to ALL Americans and our future generations. Please consider the future, not the next week's worth of oil.	Please see general comment response #35
Sarah	Little	Minerals and Energy Resources	Rather than sacrificing these spectacular places to the energy industry, please save them for the natural sustenance we and our children desperately need.	Please see general comment response #18
Sarah	Little	OHV Route Identification	Also please severly limit off road vehicles.	Please see general comment response #19
David	Litvin	Socioeconomics	Utah Utilities are highly dependent on using Utah coal. Most of the utilities that consume coal in Utah do not have ready access to interstate rail service; so seeking a source of coal from other states is logistically difficult, and in many cases infeasible. Loss of the ability to extract Utah coal would result in significant impact to electricity generation in Utah and the resulting cost to the consumer.	The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production (including coal), grazing, and recreation to local communities, such as Emery and Carbon counties. IMPLAN was used to predict direct, indirect, and induced employment and income effects. A discussion of this analysis is provided in Chapter 4, Section 4.6. An additional socioeconomic technical description document which details the methodology, calculations, results and all sources used will be provided. This technical document will report the direct, indirect, and induced results. The commentor does not indicate which of the plan decisions, if any, would restrict the ability of local mines to produce coal. See general comment response #132.
David	Litvin	Socioeconomics	With its long history of demonstrated success of operating in an environmentally responsible fashion on Forest Service and BLM lands, it is not necessary or desirable to declare the Utah coalfields highly off limits. This outcome would cause electric rates in Utah to rise significantly, impacting competitiveness and development throughout the State, and would also harm the local economies that are highly Utah dependent on the Utah coal industry for primary and secondary jobs.	See specific comment response #6867.
David	Litvin	Wilderness	BLM notes the presence of 11 Wilderness Study Areas with the Price Field Office area, including Desolation	Please see general comment response #114

First Name	Last Name	Category	Comment	Response
			Canyon, turtle Canyon, Jack Canyon, Muddy Creek, Sids Mountain, Devils Canyon, Crack Canyon, San Rafael Reef, Horseshoe Canyon (North), Mexican Mountain and Link Flats ISA. The DEIS correctly notes that these WSA's cannot become Wilderness Areas without Congressional action. The DEIS also notes that none of these WSA's would be impacted by coal mining, either by existing mining operations, or under the reasonable foreseeable development analysis. It is important that the BLM restrict the consideration of WSA's to those listed above.	
Dale	Livingston	OHV Route Identification	I am 49 years old and have enjoyed the beauty of the San Rafael area for 35 years. My children are grown up now and have families of their own but they still enjoy the outdoors. Our family and extended family has grown in size but we want to continue to enjoy this area together without restrictions on group size. (How could we decide who can come on family vacations?) My wife had knee surgery in 1978 and has never been able to hike or ski with the family. Motorized transportation by ATV is one of the few ways she can participate with our active family. Please do not close or restrict travel in the San Rafael. We have always respected the area and taught our children to do likewise.	Please see general comment responses #80 and #81
Heather	Livingston	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. Please keep the Chimney Rock Summerville and Humbug trail system open. All of the popular OHV Trail Systems must remain open. Your BLM maps must be updated to accurately detail the OHV designations outlined in each alternative.	See general comment responses #19 and #20
Heather	Livingston	Recreation	I understand you are going to restrict group size. I oppose that.	Please see general comment response #81
Steven	Lloyd	Wilderness	I encourage you to support protection of areas like: the San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek. To just name a few, it is most important that we save these areas and others like them for our children to experience and pass on to their children. It is important that we move to non fossil fuels and exploration to conserve our heritage and history. This includes trails and public land use that doesn't destroy our history. As a person who has descended from our native peoples it is most important that our history be preserved, by protecting areas proposed as wilderness.	Please see general comment response #109
Anne	Lobdell	Minerals and Energy Resources	The benefit of preserving these areas for long-term recreational use far outweighs the short-term gains to be had by leasing them to oil and gas companies. The leasing of land to oil and gas companies must be done with the utmost caution.	Please see general comment response #18
Anne	Lobdell	OHV Route Identification	Because ORVs can be detrimental to the landscape, I do feel that it is necessary to limit the amount of access these vehicles have and to utilize an enforcement plan for these vehicles.	Please see general comment response #19
John	Lohse	Minerals and Energy Resources	These lands belong to all of the American people and should be managed for multiple non-destructive uses. Oil and gas leasing and ORV use are not compatible with this objective. These areas should be closed to gas and oil leasing. Just as importantly, no new roads or motorized rights-of-way should be allowed in these areas as that would destroy their wilderness character.	Please see general comment response #101
Mary Beth and John	Lohse	Minerals and Energy Resources	Oil and gas leasing and ORV use are not compatible with this objective. They are also a threat to archeologically important areas such as Nine Mile canyon.	Please see general comment response #18
Mary Beth	Lohse	OHV Route	Oil and gas leasing and ORV use are not compatible with this objective. They are also a threat to archeologically	Please see general comment response #19

First Name	Last Name	Category	Comment	Response
and John		Identification	important areas such as Nine Mile canyon.	
Mary Beth and John	Lohse	Wilderness	We want the management plan to protect all areas proposed for wilderness in 'America's Redrock Wilderness Act' and those areas identified by the BLM as having wilderness characteristics under the '202 process'. These areas should be closed to gas and oil leasing. Just as importantly, no new roads or motorized rights-of-way should be allowed in these areas as that would destroy their wilderness character.	Please see general comment response #111
Randy	Long	Minerals and Energy Resources	No testing for any type of energy should ever be done in any proposed wilderness area. These types of activities should be directed to more sensible areas far from proposed wilderness areas.	Please see general comment response #101
John	Longwell	Minerals and Energy Resources	I have spent a considerable amount of time in this area and do feel it is important to preserve the natural beauty and heritage of the Nine Mile area. With that being said, I also know that under the current regulatory environment, adequate safeguards are in place to accomplish the protection of these resources while allowing natural resource development. With pending gas shortages, now is certainly not the time to limit access to known resources.	Please see general comment response #18
Mike	Looney	Transportation and Access	I would like to lend my input and support to the access afforded by the back country airstrips that dot your resource area. Many of these have a sense of historic value, as they are connected to mining ventures long past, such as the strip at the Hidden Splendor Mine. Others have served oil exploration and ranching. Of the scores of airstrips largely carved out and used in the days of the uranium boom, many have gone native, as it were. That is as it should be. I earned plenty of scratches pushing through the tamarisk to try and find the remnants of the strip at Bowknot Bend alongside the Green River. Likewise, gone are the days that pilots delivered ice cream to river clients using the (extremely) short strip at the mouth of Rock Creek in Desolation Canyon. The access afforded by some of the remaining landing sites, however, provide a unique and in some cases necessary entry point for other back country uses. The existence of the strip at Sand Wash, for instance, allows river runners to escape a tiring shuttle, and in some cases makes a trip fit the user's schedule by shaving many hours off the total trip length. Such a convenience would be missed. Other airstrips in the RMP grant similar convenience. I've been grateful to have had the opportunity to enjoy the back country while still fitting trips within my time budget. Strips such as Cedar Mountain, Mexican Mountain, and Horseshoe Canyon grant users such as myself and others both in and out of Utah to quickly visit these beautiful back country destinations with negligible impact. Four primary airstrips in the RMP are currently maintained by their visitors to a degree that affords safe and easy access for competent back country aviators. I would trust that their continued use be written in to the RMP. These are Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat/Peter's Point. Particularly in the case of Mexican Mountain, I appreciate your office's gracious support of the airstrip There are several landing sites in scope of the plan which might be overlooked, however. I'd respectfully request that you solicit input and comments regarding their disposition. These include, but are not limited to: Horseshoe Canyon Stone Cabin Gas Field Sagebrush Bench Cliffdweller Flat	Please see general comment response #21

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			Gruvers Mesa Sweetwater Reef Temple Wash Thoughtful consideration of these sites may create a precedent which could lead to the inclusion of the ranch strip at Range Creek as a public access resource. I, among others, would be happy to see this as an outcome. Back country pilots in the West have largely compiled an enviable record of environmentally sensitive and safe use of the resources that public lands have provided. With minimal maintenance and impact, and with the cooperation and permission of the agencies involved, we would like to ensure that these opportunities continue.	
Brick	Loring	Transportation and Access	Air travel is an important travel option for my family. It is very low impact and the airstrips in question allow us to access innumerable, stunning natural areas. We feel lucky to have such an amenity. This type of access is wonderful and we appreciate the opportunity to maintain access to them.	Please see general comment response #21
Perry	Loughridge	Transportation and Access	Hello, my name is Perry Loughridge and I am a member of the Rising Sun 4x4 club here in Colorado. I've just recently visited the San Rafael Swell with a couple other members of the Club. I was quite impressed to how well the area was marked. Using maps/gps and following the signs we were able find our way fairly easy. One thing I did notice/would like to see more of is information on outdoor recreation use. With this area offering so many different aspects of out door recreation, I think it would be a valuable tool. For the most part the area is really well maintained, we did find some trash on the Fuller Bottom road and tried to pick up as much as we could. We also met Deputy Jeff (we couldn't get a business card from him). He was really informative on the areas that we could go. Thinking about it later, I was really glad we ran into Deputy Jeff. The only area we found that raised a concern was the "upper Black Box" trail of the Mexican Mountain road. It took us quite a while to find the trail, even then it was questionable to us until we came upon a trailmarker. With us spending that much time to look for the trail and having to do a little cross country travel that made us very uneasy. With lots of people visiting the area each year and probably having the same difficulty in finding the trail, I'm becoming worried about the impact this will leave on the land. Thanks listening and for such an amazing area to be able to explore from OHV, foot, bike, horse or whatever the preference may be. And I know through responsible recreation, we will be able to enjoy it for years to come!	Please see general comment responses #10 and #15
Charles	Love	OHV Route Identification	I urge you to reconsider and revise the proposed plan for ORV use in the Price district. I believe that it opens far too many trails to ORV's, threatening the local ecology and the ability for other users to enjoy the wilderness. I am very worried about the quality of the citizen-proposed wilderness areas being threatened.	Please see general comment responses #12 and #36
Larry	Luckinbell	Transportation and Access	Please keep strips open! We get a lot of pleasure out of being able to use remote strips.	Please see general comment response #21
David	Ludlam	OHV Route Identification	I am concerned that if the BLM approves the Price Resource Management Plan with land use designations and no travel plan, the ORV community in Eastern Utah and Western Colorado will loose many miles of motorized routes. It seems more than reasonable to me that the BLM should acknowledge the current inventory of routes prior to land use designations. The agency surely sees the rational behind my concerns?	Please see general comment response #19
David	Ludlam	Recreation	The notion that an SRP would be required for non-commercial group activities. If this is a requirement for ORV users, then it should also apply to all other groups of interest who enjoy our public lands under the doctrine of	Please see general comment response #81

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			multiple use.	
David	Ludlam	Recreation	It seems to me that the BLM should hire an ORV specialist that not only understands the culture of the mechanized community, but is also familiar with how to manage this extremely popular and economically beneficial use of our public lands. The BLM staff has no one who participates in these activities and this troubles me as the BLM does have field staff publicly and unprofessionally sympathetic to the callings of SUWA.	Please see general comment response #94
Rick	Luttmann	Minerals and Energy Resources	Oil and Gas: I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment response #101
Rick	Luttmann	OHV Route Identification	Management of Off-Road Vehicles: It is important that the BLM designate specific trails in the RMP and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any 'open areas' where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12 and #19
Rick	Luttmann	Wilderness	I ask the BLM to: -Protect lands within America's Redrock Wilderness! -Manage our public lands as the citizens would like to see them managed, not big business and/or the Bush administration. -Not offer citizen proposed wilderness lands to oil companies for development. Preserving special places now proposed for wilderness from oil and gas development will ensure that these natural wonders, critical plant and animal habitat, riparian corridors, and ecologically sensitive areas will not be squandered for short-term, speculative gain. -Designate off-road vehicle trails outside of citizen proposed wilderness areas. Designate citizen-proposed wilderness areas as semi-primitive non-motorized to protect them as such.	Please see general comment responses #12, #19, #36, #101
Steve	Lwekes	OHV Route Identification	New regulations now restrict small groups from congregating and traveling on BLM land without a permit. The restrictions behind this permit make it very difficult for groups to enjoy the abundance of recreational areas available to them. Because groups will have to register with the BLM 180 days in advance, have group insurance, submit an operation plan, and pay for the permit, many organizations may choose to disband... Groups are not allowed to organize any event involving over ten vehicles. This includes club websites, newsletters, flyers, phone calls, radio announcements, or posters. These regulations create and expense and inconvenience that will discourage most family, friend and clubs from these types of wholesome activities. In essence, the regulation discourages people from bonding together for a common goal or interest. We in this area do not wish to be governed by unjust laws. Until the plan can be further clarified to the public, the only option is Proposal A, to leave the regulations alone for now.	Please see general comment response #81
Steve	Lwekes	Socioeconomics	This would be tragic for the community since clubs educate the public on proper land use and bring in large revenues for local businesses. Many people in Castle Country enjoy riding 4-wheelers, driving 4-wheel-drive vehicles, and trailer camping. There is virtually no place these people can go to reach a recreational area that does not cross BLM land. The people who participate in these activities spend large amounts of money on their equipment, gasoline, and accessories. If they are forced to follow the strict regulations required under this new permit, the many of the people will find it too troublesome to vacation in this matter, thus stopping the monies for businesses from coming in.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of recreation to local communities, such as Emery and Carbon counties. The DEIS discusses, in qualitative terms, the socioeconomic impacts of changes in recreational activities. Due to incomplete data on recreational

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				activities, the analysis was unable to quantitative estimate changes in jobs and earnings tied to recreation in the local area. The analysis was re-edited to further evaluate these impacts and is discussed in Chapter 4, Section 4.6.
Ben	Mabbutt	Transportation and Access	You can see tire tracks from motorcycles on sides of mountains for a long time, some times forever if they become eroded by water. With four wheelers you can have the same effect of the riders try and take them where they shouldn't go. The tire tracks it leaves are only for a short distance, they start and they end in short distances. They are only on flat land so no erosion problems, no real use of roads to speak of really.. Places like Mexican Mountain, Hidden Splendor, Cliffdweller Flats, Cedar Mountain and the others that are on the list for the RMP for the Price Office.	Please see general comment response #21
Rod	MacLennan	Transportation and Access	To close any of the airstrips in the back country would take away this resource as many of my fellow aviators do the same things. I urge you take these items into account when someone or group, wants to close public lands to aircraft.	Please see general comment response #21
Rod	MacLennan	Transportation and Access	Over the years I have operated my aircraft out of many Utah back country airports. Mexican Mountain. Hidden Splendor, Cedar Mountain, Sagebrush Bench, Cliff Weller Flat, Sweetwater Reef, just to mane a few. In the time I have used the airstrips and hiked the areas around Utah. I have found a lot of junk that backpackers have left behind. As some one who cares for the land, I pick up a lot of this debris, as I can carry it out in my airplane. I have on three occasions taken people out of the remote areas that were injured and in one case close to death, at my own expense. To close any of the airstrips in the back country would take away this resource as many of my fellow aviators do the same things. Airports in the back country have very little impacted on the land as they use such a small amount of area and only leave a small foot print in the dirt. To take any strip out of the back country would put the areas out of reach of many people who are physically challenged and leave the other people who clam to want only limited access to these areas at grater risk to their lives. I urge you take these items into account when some one or group, wants to close public lands to aircraft. I have operated B747's world wide in support of U.S. operation in war and peace and I can say with out a doubt, we have one of the best land use systems in the world. Keep up the stewardship and thanks you for reading my letter.	Please see general comment response #21
Logan	MacMillan	Minerals and Energy Resources	RFD is low by a factor of 2x to 3x. The Boos Allen Mineral Potential Report is a joke - they should be barred from any further work on RMPs. BLM geologists also bear responsibility.	Please see general comment responses #51, #52 and #53
Luan Fauteck	Makes Marks	Cultural Resources	I am concerned that the RMP's preferred alternative leaves Nine Mile Canyon open to further industrialization. Allowing non-surface occupancy resource extraction in this area has great potential for damage to priceless Native American cultural and spiritual sites. Drilling under the ground toward the canyon bottom could disturb the known 10,000 petroglyphs, not to mention areas of rock art which have not been discovered yet. Further, the full impact of Nine Mile Canyon to both visitors and Native people cannot be preserved by simply cordoning off known and highly visible rock art panels. Nine Mile Canyon holds the remains of the full spectrum of life as lived by the Fremont and Archaic cultures, and later the Ute tribe, including pit houses and granaries. It is also of ongoing spiritual importance to the Ute and Pueblo people-to Native people, petroglyphs are not just 'art' but a direct connection to their ancestors. Drilling should not be allowed anywhere near the bottom or sides of Nine Mile Canyon. As an alternative, I endorse the Castle Country Heritage Plan. The Castle Country Heritage Plan is	Please see general comment responses #9, #35 and #54

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			a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs , dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place.	
Diane	Mandler	Wilderness	We think all areas proposed for wilderness in America's redrock Wilderness Act should be closed to all ORVs and oil and gas leasing... we think roads and oil and gas leasing should be kept out of all Wilderness Study Areas as well as Wilderness Areas.	Please see general comment responses #18, #36 and #101
Amanda	Mangold	OHV Route Identification	We have lived in Utah for 24 years and have visited many of Utah's beautiful wilderness sites. Some of my favorites are Eagle Canyon and the San Rafael Reef. These outdoor sites are very important to us and our families, they need to be preserved and kept authentic. Many people look forward to visiting the wilderness mainly to get out of the loud busy life in the city, enjoying the outdoors without the sound of motorized vehicles. We both personally enjoy and peaceful wilderness experience, and it's important that Utah's wilderness characteristics are preserved. Thank you for your time.	Please see general comment responses #12 and #36
G.C.	Manley	Lands and Realty	I need to know information on the Hunt Oil land trade taking place on Bruin Point up Whitmore Canyon above the town of Sunnyside Utah with the BLM. I know that your agency is dealing with this issue and I would like to know just exactly what land is involved in this land trade. As a tax payer and outdoors person I feel there should be no secrets about this land trade to the public. After all it's our tax dollars that support your agency and I feel the right to know everything there is to know about our public lands and land trades. I've tried to talk with my local BLM office and they put me off and gave me no information on this or any other land issues concerning Bruin Point up Whitmore canyon above Sunnyside Utah. I feel there must be something to hide in this land trade issue. If not what's the big deal in letting the public know what is in the works for them. Please help me to find a copy of the agreement with Hunt Oil And the BLM on this land trade taking place. Thank you for your time and concern to the public interest.	Specific details and analysis of the Hunt Exchange proposal is outside the scope of the Price RMP because the RMP is an umbrella document that provides guidance for broad areas of action including criteria and areas available for acquisition and disposal. The Price RMP will not approve specific actions such as this specific exchange proposal. The specific actions in this area would require NEPA analysis before approval. The Hunt Exchange proposal is currently being examined in a feasibility report. If the decision is made to process the exchange, a NEPA document would be prepared to analyze the potential impacts of the exchange, and the public would be notified and afforded an opportunity to be involved.
Anthony	Mann	Wildlife and Fish	The EIS does not discuss, nor deal with potential impacts under any of the alternatives to the following animals: Any of the members of the family Chiroptera, including (but not limited to) Euderma maculatum; any obligate and endemic spring and stream fauna including (but not limited to) the following: Coleopterans, Elmidae, Hemipterans, Naucoridae, Trichopterans, Lepidostomatidae, Hydrobiidae and Amphipods	No specific issues regarding these groups have been identified. Please see general comment response #7
Chuck	Manning	Transportation and Access	I am writing this letter in support of Alternative D of the Price Field Office RMP, including the "continued use" of Mexican Mountain, Hidden Splendor, Cedar Mountain and Sage Brush Flat/Peter's Point in the Support/Transportation portion. I am a Montana pilot who enjoys flying the backcountry for recreational purposes and use remote airstrips as trailheads for further recreational activities. It also gives me reassurance to know when flying over rough terrain on cross-country flights, remote airstrips are within reach and I plan my flights accordingly.	Please see general comment response #21
Robert	Manning	Process and Procedures	I have reviewed the draft Price Resource Management Plan as well as the Castle Country Heritage Plan. The CCHP calls for effective and balanced regulation to protect areas in the Redrock Wilderness by carefully regulating and controlling the use of off road vehicles and dirt bikes and by prohibiting oil and gas development	Please see general comment response #35

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			within these areas.	
Karen	Mara	Minerals and Energy Resources	I encourage you to protect wilderness areas from development by oil companies and gas development.	Please see general comment response #18, #36 and #101
Karen	Mara	OHV Route Identification	I also suggest that you limit off road vehicle use to designated trails and protect all other public lands from the damaging impact caused by these vehicles.	Please see general comment response #19
Karen	Mara	Wilderness	I urge you to approve a plan that protects wilderness areas, including San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek.	Please see general comment response #36
John	Marflitt	Process and Procedures	I am writing to protest the Price Resource Management Plan draft alternatives. Please protect America's Redrock Wilderness! The Castle Country Heritage Plan is a reasonable, well-balanced plan, and it should be adopted by the BLM.	Please see general comment responses #35 and #36
Gus	Marinos	Minerals and Energy Resources	The proposed alternative will reduce jobs in our region and cut tax revenue for schools and local governments in Utah. The preservationist point of view seems more prevalent than economic need at the national and local level. This seems to be a violation of the spirit of NEPA. I hope you will rewrite the Price District RMP to include a more comprehensive socioeconomic outlook for the region.	Please see general comment responses #18 and #132.
Ty	Markham	OHV Route Identification	The BLM needs to complete a comprehensive route designation plan within the Price Field Office that considers non-motorized users of public land, protecting sensitive areas that will be ruined by continued ORV use.	Please see general comment response #19
Michael	Marsolek	Minerals and Energy Resources	As a researcher in graduate school I believe it is time we more seriously put effort and energy into finding alternative energy sources to these fossil fuels, rather then continuing to dig up every last inch of land that might hold a drop. This would be better for our environment, and also better for our country, as it is inevitable that these fossil fuels will run out and it is in our best interests to begin to find their alternatives now. You can help this by denying the request for drilling in these areas, and I ask you to do just that. We cannot keep digging up the final pieces of pristine land in America when there are other alternatives; the generations to come after us deserve this gift. We were given it by those who came before us, and I don't want to be the generation who threw all that hard work away. Thank you.	Please see general comment response #18, #36 and #101
Robert	Martin	OHV Route Identification	I live in CT, in our state you can see the huge impact ATV's have when allowed to run uncontrolled through the forests. Deep ruts and uncontrolled erosion appear within months of ATV's showing up in an area. In the fragile land of UT where a track can remain for years after just one passing allowing such wide use of these vehicles is a big mistake. Cape Cod ended up closing most of their dune areas because of wide spread destruction from off road vehicles.	Please see general comment response #19
Dorena	Martineau	OHV Route Identification	The OHV's also are another part of our concern, for they do travel across a great deal of the country making their own road and doing damage to the terrain.	Please see general comment response #19
Cassidy	Martinez	Wilderness	Although the BLM has confirmed that more than a million acres of lands in the Redrock area qualify for federal wilderness protection and 1.5 million acres are included in America's Redrock Wilderness Act, the draft plan would open virtually all of these wildlands to oil and gas development. This is not land management, it is land destruction.	Please see general comment response #36 and #101
Mike	Maskalans	OHV Route Identification	It's not fair to those working with the BLM on these issues not to have all information easily at hand. The impacts of the implementations of various proposals must be made clear: The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. Plotting these changes in whole on maps for investigation by all interested parties is vital (especially for clarity on what sorts of OHVs will be allowed	Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require

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			on what trails under each plan).	reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Also general comment responses #19, #20 and #79
Mike	Maskalans	OHV Route Identification	The severe group size limitations being proposed will hurt club activities. There is no justification for the radical limitations being proposed, and those who will be restricted are the most responsible wheelers out there: club members.	Please see general comment response #81
Mike	Maskalans	OHV Route Identification	I feel I must emphasize that it is a priority for currently designated trails to remain open to access. Trail closures don't benefit those who give back so much to the land on which they wheel, and to their vacation bases of operation in your fine state.	Please see general comment response #19
Mike	Maskalans	Process and Procedures	Management of lands needs to be clear, and restrictions need to be simple. It will help with compliance and enforcement. With the many proposed levels of management restrictions will not be universal across managed lands, and without clear boarders both compliance and enforcement will quickly become a mess.	Please see general comment response #37
Susie	Mason	Minerals and Energy Resources	Thank you for the opportunity to comment on the Price Draft Resource Management Plan and Environmental Impact Statement (Draft RMP/EIS). I support the continued development of oil and natural gas in the planning area covered by the Draft RMP/EIS. However, the Preferred Alternative as written fails to lay out a basic foundation for future land use decisions by broadly imposing restrictive measures to limit industry's ability to access lands for environmentally responsible oil and gas leasing, exploration and development. Specifically, I request that the Preferred Alternative be adjusted to address the following: BLM needs to redraft the Reasonable Foreseeable Development to comply with BLM policy and realistically address the development potential in the planning area.	Please see general comment response #51
Susie	Mason	Process and Procedures	BLM should revise the Preferred Alternative to reduce excessive restrictions associated with wildlife resources, eliminate the Nine Mile Canyon and Range Creek ACECs, and limit its application of Visual Resource Management Class II to areas where no existing or future resource development activities are expected to occur.	Please see general comment response #2
Susie	Mason	Socioeconomics	BLM needs to fully analyze the socioeconomic impact of the restrictions placed on oil and natural gas development within the planning area.	Please see general comment response #132
Jim	Matheson	Wild and Scenic Rivers	Emery county officials believe that Wild and Scenic River designation may do more harm than good for the preservation and quality of their water resources. The limited water resources are already over allocated across Utah, and I take the concerns of those in Emery County. I hope that you will work with the local officials and I to ensure that no actions taken on behalf of your agency will encumber the ability of Emery County to provide water resources for its residents.	Please see general comment response #26
Jim	Matheson	Wild and Scenic Rivers	Local officials in Emery County are particularly concerned about the proposal to designate river segments within the County as Wild and Scenic Rivers because of the potential impact that such a designation could have on water rights and land management across the West.	Please see general comment response #86
Michael	Mathiesen	Transportation and Access	I have been a wildlife hunter for many years. I feel that being able to access these areas free of OHV use to be very useful to these game animals. However the animal population is increasing and should be controlled with hunting.	Please see general comment response #10

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			If I am spending extra time to travel around the trail/roads closures, then I will not be able to cover as much ground while hunting. That causes an abundance of hunters in a certain area and less animals can be controlled. Please open as many trails as possible to help hunters help control the over population of game animals, and allow them to be used with most OHV's.	
Michael	Mathiesen	Transportation and Access	The forest is big, you are going to manage alot of area, a nice trail through the land maybe most of the time at most 10 feet wide. In consideration, please do not rules that will prevent people from accessing game lands, livestock, or visit places that are not accessible by foot. It takes three days to walk somewhere you can ride to in 4 hours. and to make some area's illegal to ride/drive on when area's around this forbidden land is legal. make an area completely off limits if you want people to stay out, for a good reason.	Please see general comment response #10
Jaxon	Matthews	Wilderness	I sincerely desire that wilderness areas such as Desolation Canyon, the San Rafael Swell, the Book Cliffs and Labyrinth Canyon be preserved as they are as much as possible and protect from off road vehicles I also oppose drilling for oil and gas and any industrial development in the areas. I support the Castle County Heritage Plan. These wilderness quality areas should all be preserved for future generations.	Please see general comment response #111
Mycah	Mattox	Minerals and Energy Resources	This letter is concerning the current plans to revise your resource management plans in the area you currently manage. I have lived in Utah for about 23 years. I have been to many other beautiful places, but none that match what Utah's beautiful desert, plain, and mountains show. When I was younger, my family would go on trips with other families. We frequented the areas that are currently under consideration for oil drilling. I have to say that I though those areas were fantastic. Never before had I seen such wonderful artifacts of a lost culture. To see where they lived was one of my fondest childhood memories. I think it would be a shame to let money get in the way of so much lost and already so forgotten history. Not even to mention the disturbance of the habitat that lives there. I recall camping trips to the swell, and to desolation, and being barred from those places is like barring me from what I love so much about this state. Don’t turn our state license plate from a national landmark to an oil rig. We already have one - Texas.	Please see general comment response #18
Kenneth	Mattus	OHV Route Identification	We especially enjoy the OHV access to public lands... the only way that I can enjoy public lands is in a Jeep... I am concerned that the BLM is taking the wrong course in wanting to restrict the group size on some BLM lands... You need to stick to the current and proven policy limit of 50 vehicles. The proposed overlapping management "layers" in the San Rafael Swell is unacceptable	Please see general comment response #81
Jim	Maucker	OHV Route Identification	Unfettered OHV use has worked out very well so far, creating No Significant Impact in the San Rafael Swell area and other areas. Let’s stick with it. It works for all of us, both OHV users and the BLM. If hikers, environmentalists, etc don't like it then they can go the Wilderness or into the huge masses of public lands that are already not open to OHV use.	The route designation process was started from a baseline of known existing routes. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses. Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives.

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Jim	Maucker	OHV Route Identification	The preferred alternative does not show OHV routes on its OHV route designation map. It shows paved roads. Since what is on the maps is defined as what we get, this empty map screams "no OHV allowed". Verbal assurances that the SRMRDP will be made part of the final document are absolutely not adequate or acceptable. This document is unfinished and does not meet NEPA requirements.	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives.
Jim	Maucker	OHV Route Identification	A large quantity of GPS data defining OHV routes has been supplied by users to the BLM yet this document ignores it. To be valid, this document must include all that data and give it due consideration.	Please see general comment responses #19, #20 and #31
Jim	Maucker	OHV Route Identification	Any area containing an OHV route should be designated as open to OHV's. High use areas should be very few in number, be small, should not restrict OHV use in any other area.	Please see general comment response #19
Jim	Maucker	Process and Procedures	The complexity of this DRMP/DEIS management plan is overwhelming. It must be simplified so that is has all route data, eliminates endless overlapping layers of SRMAs, ERMAs, ACECs, high use areas, large group restrictions, controlled camping, threats of using private concessionaires to degrade our recreation opportunities, fees to punish specific uses, etc. This is much too complex, too controlling, and too difficult for regular citizens to deal with. Users cannot tell how the lands will be "managed". It appears that it will most likely be repressive management.	Please see general comment response #37
Kelly	Maxfield	Minerals and Energy Resources	ML 40 needs to be recognized as an existing ROW corridor in the final RMP/EIS. Questar also supports the concept of designating one or more ROW corridors around Nine Mile Canyon. Questar suggests that the RMP/EIS indicate that utilities must generally follow these ROW corridors. Questar suggests that the definition of major pipeline be increased, at a minimum, to include all pipelines greater than or equal to at least 24 inches in diameter. Pipeline crossing of stream channels in the state of Utah are generally under the jurisdiction of the Stream Alteration Permit program administered by the Utah State Engineer's office. As such, Questar recommends that the Draft RMP/EIS should instead utilize state of Utah guidelines. Accordingly, Questar requests that the requirements to submit SWPPPs to the DEQ be removed from the Draft RMP/EIS.	Map 2-54 in the Proposed RMP/Final EIS shows corridors incorporated into the Proposed RMP. The level of surface disturbance associated with pipelines greater than 16 inches is such that more intensive management (i.e., restricted to designated ROW corridors) is required to ensure the protection of other resource values within the planning area. The smallest diameter for a transmission or sales line is usually 16 inches. This type of line would commonly be looped at some point following its construction. That process would require dedicated space in which to construct the loop line. The need for dedicated space would require that the original transmission or sales line be placed in a corridor. A 16-inch line, however, would not always be a transmission or sales line. In an area where there is a large number of wells, a 16-inch line could also be used for a lateral gathering line. In that case, inclusion in a corridor would not be necessary. For specific projects, BLM requires that all necessary state and local permits be obtained by the applicant.
John	Maxwell	Minerals and Energy Resources	Please do not leave up to 98 % of unprotected wilderness open to gas and oil development.	Please see general comment responses #36 and #101
Jim	Mays	Process and Procedures	I don't support the Price Resource Management Plan and instead endorse the Castle Country Heritage Plan being promoted by the BLM. It is a balanced approach to the wide range of environmental, recreational, and economical demands being placed on the area surrounding the Redrock Wilderness Area. We need to protect the	Please see general comment responses #35 and #36

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			area from excessive oil and gas development and minimize the effect of ORV use without limitation. I endorse reasonable opportunities for these activities to take place. This refers to areas around the Redrock Wilderness only. None of the oil and gas development or ORV use should take place within the Redrock Wilderness itself, or areas such as Sids Mountain. We need to put back the word "management" in the Bureau of Land Management and not let it be the bureau of "anything goes" as long as there is money involved.	
Bonnie	McAllester	Lands and Realty	Constructing roads in such fragile (and spectacular) desert areas does an injury to all of us and to our children who have never had a chance to see such wildlands. The roads open the areas to destruction by off-road vehicles.	Before authorizing the construction of roads on public land, BLM would analyze the potential impact to natural and cultural resources through the appropriate NEPA documentation.
Bonnie	McAllester	Minerals and Energy Resources	Add my voice to those of many others who oppose the opening of public lands in Utah to oil and gas drilling.	Please see general comment responses #18 and #101
David	McAllister	Recreation	I am deeply concerned about the bureau of land managment's plans to open the Utah Wildlands to recreational and commercial exploitation. The reversed of our countries tradition of conservation shows a regrettable insensitivity to the welfare of future generations.	Please see general comment responses #14 and #36
Roberta	McAlpine	Transportation and Access	Please don't close these runways. Pilots are VERY conservation aware. We make less noise than boats, RV's ATV or most other motorized vehicles out there. The runways don't take up much space and they don't take a lot to maintain.	Please see general comment response #21
Patricia	McCabe	Minerals and Energy Resources	Please do not open the Red Rock Wilderness area to mining development. This area has important archeological and environmental treasures which should be safeguarded. Mining and off road vehicle traffic would be an ugly disturbance. I realize that these industries exert heavy political and financial pressure, but please consider that safeguarding the future of this wilderness area is sacred trust for all of us	Please see general comment responses #18, #36 and #101
Michael	McCandless	ACEC	Because ACECs are eligible to be discontinued , continued, or modified as a part of this RMP process, an analysis of the effectiveness of the designation would have been highly beneficial and should have been a part of the RMP. In the BLM Manual, Rel. 1-1541 (09/29/88) section 1613 discusses ACEC designation. Section .6 states that "The FLPMA requires the BLM to give priority to the designation and protection of ACEC's... Follow up monitoring is also essential for ensuring the protection of ACEC values and resources" Included in the manual the following are required ongoing required items: 1.ACEC Implementation Schedules (.61), 2.ACEC Activity Plans (.62), 3.ACEC Monitoring (.63), 4.Conformance Determinations and NEPA Compliance (.64), 5.Annual Status Report on ACEC's. (.65) I would argue that these required steps have not been followed and as a result the information required making a valid case for continuing these ACEC's is missing. I would like to specifically address a couple of these requirements. First, in section .63 it states that "ACEC Monitoring is part of the monitoring provisions in the RMP. The BLM's planning regulations prescribe that the RMP shall establish intervals and standards for monitoring. The intervals and standards are to be based on the sensitivity of the resources. In the case of the ACEC's the resources are assumed to be sensitive. Therefore, careful monitoring is critical - not only to ensure that protection of the identified resources values occurs, but also to keep the managing officials aware of how well the RMP provisions are accomplishing their objectives. By doing so, the need, if any for modification to the RMP will be identified early so that the protection is accomplished and unnecessary measures are not applied... In accordance with 40 DFR 1505.3 (d), the managing official shall, upon request, make available to the public the results of monitoring." In my review of the RMP document as well as	Please see general comment response #127

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			through discussions with local PFO officials, it appears that the monitoring required by the BLM Manual was not conducted. As a result, there is in fact, no management plan in place for the existing ACEC's. Furthermore, in section .65 from the BLM Manual, the State Director is required to deliver a report to the Director "progress in implementing and monitoring ACEC's in order to track accomplishments in managing ACEC's and to provide an available base of information for responding to Congressional and other inquiries". In our discussions with the PFO it does not appear that this information was created and is therefore not available. The only information on the existing ACEC's that has been offered is the original importance and relevance criteria that were used to create the designation more than 10 years ago. If the BLM cannot meet existing requirements to monitor and react to issues in existing ACEC's, these designations should be considered for removal and other ACEC's in the field office should not be designated. The continuation or roll over of existing ACECs is also not in compliance with the requirements of the National Environmental Policy Act (NEPA). In my opinion, there should be a complete and total review of all existing ACECs to determine their suitability in relation to the current management environment in the area. The document also fails to recognize the effectiveness of other existing designations including even the existing Wilderness Study areas (WSAs). A detailed examination of existing management plans and a determination if these management plans are meeting their objectives should be a critical component of the RMP...	
Michael	McCandless	ACEC	The BLM cannot make the term "irreparable" subjective. Furthermore, the cornerstones of the ACEC designation are "Relevance" and "Importance". How can the definitions of Irreparable, Relevance, and Importance change, based on the RMP Alternative that is selected? Either an area qualifies under the Relevance and Importance criteria or it does not. This should not be subjective based on proposed management after the designation is determined.	BLM Manual 1613 section .22(B) provides that ACECs can vary across alternatives both by alternative management provisions as well as alternatives that do or do not contain a given ACEC. Evaluating a range of alternatives allows the BLM to assess the impacts of not establishing certain ACECs and allows comparison of the impacts of alternatives. Also see general comment responses #131 and #153
Michael	McCandless	ACEC	The BLM through its interpretation of certain words is misusing designations and protective tools. In particular, the ACEC designation is reserved as a tool (through congressional mandate) to prevent "irreparable damage". In my way of thinking the term irreparable means that it cannot be repaired. This coincides with the Webster definition which is "{damage} cannot be repaired, remedied, retrieved, etc., an irreparable loss." Unless the BLM provides, as part of the document an alternative definition of the term "Irreparable" then they are required through statute and supported by court, that the generally acceptable definition of the term is to be used. This is clarified in Bates v Runyon, No 95-5183, 1996 WL 532201, at *2, 10th Cir. Sept 19, 1996, where the decision states that "It is a cardinal principle of statutory construction that a court's interpretation of a statute begins with the plain meaning of the statute's words."... the proposed ACEC restrictions in the RMP must be validated by the accurate use of the term "irreparable". This means that historic uses (OHV use, drilling dispersed camping, grazing, etc.) must be excluded from restrictions under ACEC designation unless they meet the common threshold of the term irreparable. In most cases, they will not meet this criteria because these uses have been demonstrated to be repaired or mitigated... If damage can be mitigated or repaired, it is not irreparable...	Please see general comment response #153
Michael	McCandless	ACEC	MANAGEMENT AREA SIZE - In many cases throughout the RMP, there appears to be a buffer zone mentality rather than specifically protecting the resource in questions... Rather than targeting the specific resource, the areas are expanded to cover arbitrary acreage that may provide unnecessary restrictions on those areas. This, by definition, could be in violation of the Relevance and Importance criteria. The ACEC should specifically cover the	Please see general comment response #155

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			resource that is to be protected.	
Michael	McCandless	ACEC	ACECs are also used to expand borders of WSAs and to add additional protective restrictions to an arbitrary geographic boundary that was not included in the Congressional designation of the WSA. The appearance here is that the ACEC was created simply as a buffer zone to the WSA simply to preclude SITLA from developing the tract. As a part of the RMP, this designation as well as other ACECs created in 1991, should be reexamined to determine if they actually meet the relevance and importance criteria based on the size and shape of these designations. Under any circumstance, they should not be used as a de fact buffer zone. According to the BLM MANUAL 1613 - AREAS OF CRITICAL ENVIRONMENTAL CONCERN section .51 from Rel 1-1541 (9/29/88) it states in discussion of Congressional designations, "If, however, the management designation is adequate to protect a resource or value, it is not necessary or appropriate to designate it as an ACEC." The designation of ACEC's over the top of existing WSA's is in direct opposition to BML guidance and is an ineffective use of the ACEC designation.	Please see general comment response #156
Michael	McCandless	Cultural Resources	HISTORIC SITES - There is insufficient discussion of recognized historic sites, particularly recorded historic sites such as the Old Spanish Trail and the D&RGW Railroad grade.... While prehistoric sites and recent mining sites have received specific protection through the RMP, some of these more sizeable and equally important historic sites are not addressed adequately.	Goals and objectives for the Old Spanish National Historic Trail, and actions to implement them, have been included in Chapter 2.
Michael	McCandless	Lands and Realty	Transportation Utility Corridors - The plan does not adequately address existing pipeline, electrical and telecommunications corridors in terms of specific actions that might be undertaken to upgrade or improve the capacities of these existing facilities.	Section 2.16, Alternatives Summary Table, Lands and Realty portion, describes the range of designated utility corridors and ROW issuance criteria considered in the alternatives. Improved ROW design considerations include co-locating facilities such as utility corridors to maximize the utilities on site, minimize total disturbance, as well as minimize the potential for habitat fragmentation. Changes to existing ROWs would be considered through the ROW amendment process. If a ROW applicant would like a substantial deviation in use or location, then the applicant/holder must amend their ROW application. A substantial deviation would be a change in the location or use which requires: (1) construction or use outside the proposed or authorized boundaries of the right-of-way, or (2) any change from, or modification of, the proposed authorized use (such as adding equipment, overhead or underground lines, pipelines, structures, or other facilities not included in the original application or grant). The requirements to amend an application or a grant would be the same as those for a new application.
Michael	McCandless	Livestock Grazing	Pages 4-178 and 179 cover Sheep and Bighorn Sheep Habitats. The nine mile buffer is extreme and is not based on scientific data. The buffer is essentially of no value because in some areas, the Bighorn Sheep Habitat is less	Please see general comment response #98

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			than 9 miles from existing domestic farming operations. There is no basis to restrict grazing to an area that expands beyond existing private land that contains sheep. Furthermore, the 9 mile buffer potentially removes the possibility or transitioning existing cattle allotments to sheep allotments during the life of the plan.	
Michael	McCandless	Livestock Grazing	Page 4-302 - General assumption in all alternatives that wildlife will benefit from relinquishment of grazing permits. This assumption does not have a basis of science and there are some detrimental affects to wildlife that are not discussed. The primary failure is the fact that the primary developer of water sources such as ponds and springs is the Grazing Community. In many cases, livestock ponds are the only source of water in miles and the removal of permits will remove the incentive to maintain and develop these sources.	The Proposed RMP/Final EIS acknowledges that water developments for livestock have expanded the range of wildlife into areas that formerly lacked water sources.
Michael	McCandless	Minerals and Energy Resources	INCOMPLETE RESOURCE DATA - There is a failure in the plan to address a number of significant, recognized resources available in the study area... -Humates - Although there is general information in the Appendix, the impacts to the industry are not addressed in the plan -Gypsum - General information, little discussion of impacts. In particular, the two active mines near the Moore exit of 1-70 could be impacted by ACEC designation, however little attention is provided on this possibility. -Sand and Gravel - It is obvious that instead of identifying possible development of resources that could be developed, the BLM only identified existing sand and gravel operations in the study area. -Stone - Limestone reserves are not discussed at all and decorative stone is only covered at a very basic level. -Carbon Dioxide - Central Carbon County has a significant and will identified CO2 reserve. Recently a number of plans for development have been undertaken and are well publicized. -Helium Reserve - The study area contains a major, nationally recognized helium reserve. -Oil Shale and Tar Sands - Oil prices in the world wide market are approaching a level in which the development of these resources may become financially viable. Under alternative D, the development of these "Locatable Minerals" is significantly more restrictive than current management practices and may preclude the development of several known gypsum, clay and sand and gravel resources. This, despite the BLMs own acknowledgment in Table 2.16 that there is significant occurrence of these minerals in the study area. The plan simply does not deal with the development potential of these resources and simply makes an assumption that since the resources have not been developed as of this date, they will not be developed in the future... On page 4-7 there is an error in the Paragraph attached to the Lila Canyon Coal Mine. The last sentence in the paragraph should be related to water quality in East Carbon/Sunnyside Utah and not Coleman Washington... Mineral Potential Report - The report seems to adequately report the current status of mineral extraction in the study area, but fails to adequately address the ongoing potential effects future development. In addition to the basic analysis of future potential developments, the effects of these developments in terms of their socioeconomic impact as opposed to other uses (recreation, grazing, etc.) should be part of the analysis... Page 4-578 States that "A previous study by the State of Utah concluded that Carbon and Emery counties have a very small oil and gas industry". This quote was taken from the Utah Department of Natural Resources in 1995, prior to the development of the Coal Bed Methane industry in the study area. Today, Carbon and Emery Counties are among the top gas producing counties in the state and the number of new wells in the two counties are among the top 5 counties in the state. Since the 1995, a number of energy companies have opened permanent offices in the study area. Furthermore, a number of support industries have been created. This includes roustabout services, drilling, maintenance and road and pad development.	The Proposed RMP/Final EIS identifies the presence of humates, gypsum, sand and gravel, carbon dioxide, oil shale and tar sands in the Price RMP area and discusses potential impacts on development of these resources from the alternatives analyzed in detail.
Michael	McCandless	Minerals and Energy Resources	The RMP does not deal in Economic Reality - In relation to fluid minerals development, the general assumption seems to be that the solution to all conflicts is to allow for horizontal drilling or related technologies when conflicts arise. This fails to recognize the additional cost and technological challenges associated with this alternative	Please see general comment response #16
Michael	McCandless	OHV Route	ROUTE DESIGNATION - In 2003, the San Rafael Route Designation Plan was completed and is included by	Please see general comment responses #19 and

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		Identification	reference in the RMP. The northern section of the PFO will have a route designation plan included in the final RMP and will become the final route designation plan for the area. The intent of an RMP is to be an open process with as much public involvement as possible. Because of the unrealistic timeline that was given to complete the RMP, the draft RMP does not include accurate OHV and Route Designation Plans for the public to comment on. This places the public at a whole in a disadvantaged situation in relation to providing beneficial comments on the proposed routes in the north end (Price) of the PFO. Furthermore, the existing OPEN areas in the San Rafael Route Designation Plan are to be subject to route designation through the RMP process. The public has not had adequate opportunity to examine proposed routes and provide beneficial comments. Emery County and Carbon County are participating as cooperating agencies in the process, but there is a legitimate concern that the process has not met the threshold for providing adequate opportunity for the public to provide comment and this is a likely target for future litigation from a number of land use groups. Furthermore, there are inconsistencies between the San Rafael Route Designation Plan and the Recreation Opportunity Spectrum (ROS) boundaries. It seems illogical that the ROS maps would include areas in the "Semi Primitive" status that contain routes recognized through the Travel Plan. It shows a lack of overall coordination in the design of the RMP.	#145. Neither the existing or any proposed routes in the OPEN area of the San Rafael Route Designation Plan were shown on Maps 2-54 through 2-56 of the Draft RMP/EIS. Therefore, since the public has not had an opportunity to comment on these, designation of any routes will be deferred and will not be part of the Proposed RMP/Final EIS.
Michael	McCandless	Process and Procedures	A major weakness in the RMP is the failure to demonstrate or document the success or failure of existing management practices within the study area.	Please see general comment response #123
Michael	McCandless	Process and Procedures	The concept of Management Layers is completely out of control on this plan. In some cases, as many as 5 management tools (WSA, ACEC, Wild and Scenic, SRMA and VRM) are used on the same tracts of land. In some cases the layering seems to provide no additional benefits and only serves to complicate the management of the area. An example is the creation of the 766 Acre Cleveland Lloyd ACEC on top of the 2800 Acre Cleveland Lloyd designation that covers the same area. How will users of this area know the difference? What is the actual benefit of adding another layer of management?	Please see general comment response #37
Michael	McCandless	Process and Procedures	FUNDING - A general concern exists with the funding requirements necessary to fulfill the changes that would be implemented under all of the alternatives... Given current funding issues, how does the BLM intend to enforce this confusing layering of management?... Even if the BLM is able to acquire funding for the construction of the facilities, the ongoing maintenance on these developments will likely be insufficient to maintain the long term viability of these sites... Consideration must be made to only make the changes to the management plan that can reasonable be expected to be paid for by federal appropriations.	Please see general comment response #147
Michael	McCandless	Process and Procedures	Overall, there is a definite and discernable weighting toward Recreation as opposed to other land uses. Under the current BLM policy of Multiple Use, all uses are to receive the same consideration for use as another. In the Draft RMP, this is not the case. When weighting oil and gas exploration as opposed to recreation opportunities in 9 Mile Canyon, for example, the assumption is made that drilling will negatively impact recreation and archeological sites, however, comparatively less information is presented on the impacts that recreation has on the oil and gas industries. The weighting should be equal. In fact, there is an argument that can be made that the Management Plan should manage each area based on what is the BEST or DOMINANT use. If this "Dominant Resource Doctrine" were properly applied, the selection of what is the 'best' use would be simplified. Another Emphasis related comment is that all four of the Alternatives published in the RMP actually provide for additional restrictions in extractive uses as opposed to the No Action Alternative. As a result, the alternatives do not accurately provide a full range of alternatives which is a violation of FLPMA.	Please see general comment response #2
Michael	McCandless	Process and Procedures	The RMP does not adequately address the affects of mitigation efforts when discussing the impacts of specific activities within the study area. It is standard practice to develop procedures for mitigating specific impacts of activities by providing enhancements in that area or comparable area. The concept of Mitigation is not even	The descriptions of the alternatives in Chapter 2 of the Draft and Final EISs, including actions common to all alternatives, contain decisions that mitigate

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			addressed in the RMP.	environmental consequences. Appendices F, G N and S also contain provisions that would mitigate environmental consequences. The analysis of the impacts of the alternatives assumes that the alternatives would be carried out as described, with application various mitigative allocations, practices and measures.
Michael	McCandless	Recreation	INCOMPLETE RECREATION DATA - The plan acknowledges on page 4-579 that "Quantification of the economic stimulus associated with recreation in the PFO is not possible as this time due to lack of verifiable data on recreational use." This statement conflicts with page 3-48 that provides Visitor, Participant, and Visitor Days data from the RMIS data system. Basically, if you look at both of these sections, one might determine that the methodology to determine the recreation data consists largely of "reservations, permits records, observations, and professional judgment". The acknowledgement that verifiable data exists certainly seems to indicate that the major source of data is "professional judgment". This is not a valid, scientific source of data for the types of decisions that are being made in this RMP.	Please see general comment response #118
Michael	McCandless	Recreation	The general concept of development of a Resource Management Plan is to provide general guidelines for management practices for the life of the plan. Under this document, there is entirely too much attention given to specific areas and 'locking in' specific management practices for those areas. As an example, specific large group campsites are discussed, including the size and specifications of those sites. This should not be part of the RMP. This should be covered as an ACTIVITY level planning process that will occur after the RMP is published. Proper use of this concept is benefit to the BLM. By locking in specific management practices as a part of the global RMP, the BLM may be precluded from appropriately managing resources as pressures or demands on resources change.	Please see general comment response #93
Michael	McCandless	Socioeconomics	I believe it is recognized within the BLM that the Socioeconomic discussions within the RMP are inadequate and were not given the attention that was required. Section 4.12 was originally omitted from the draft document and once it was included, it was very obvious that the information was "copied and pasted" from an analysis out of Wyoming. Despite the fact that the State of Utah's Governors Office of Planning and Budget (OPB) offered to assist in the development of the socioeconomic analysis, the BLM chose to use its own resources to develop the document. The OPB has completed a county by county socioeconomic analysis during the time the RMP was being drafted, and the OPB has offered to make this document available to the BLM to improve the output of the socioeconomic section of the RMP. For the BLM to ignore the failings of the existing data would be a significant mistake. Inadequate discussion of core industries in Situation Analysis - Of particular concern is the failure to adequately address the contributions of the three power generation facilities in Carbon and Emery Counties. There is inadequate discussion of the current socioeconomic benefits of these facilities and a corresponding failure to address potential effects of the RMP to the power generation facilities... Future development of coal resources should be directly tied to the long term survivability of the power plants. The RMP only discussed the direct job increases or losses from mining without recognizing the effects to the power plants. It is well known that Pacificorp, the owner of the facilities is considering adding a fourth generation unit to the Hunter Power Plan near Castle Dale. The RMP could include recommendations and options that will assist Pacificorp in making the decision as to building the facility or not. Another related core industry that is not discussed in the RMP socioeconomic analysis is the trucking industry. The economic benefits and impacts of this industry are tied to the other extraction and energy production industries. The trucking industry employs substantial numbers of local	See general comment responses #118, #132, and #133. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, section 4.6. The analysis of impacts on socioeconomic conditions has been updated and expanded for the Proposed RMP/Final EIS in response to several public comments. Considerations and changes include: 1) additional clarity on the No Action alternative serving as the baseline, which all other alternatives are evaluated; 2) significance criteria for income and employment change have been re-evaluated;

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			workers. Some estimates place the number of full time truckers at around 175 employees... the RMP does not discuss in detail the overall impacts of the coal market from the RMP, despite the fact that the BLM is the permitting agency for all coal leases on federal ground in the two counties (Carbon and Emery)... BLM policies implemented through the RMP will affect a greater geographic and economic area because of the role that BLM has in the permitting process. This is not discussed at all in the RMP and particularly in the Socioeconomic Section... The draft plan insufficiently recognizes the potential affects of the RMP to the valuation of the lands as the dollars return to the local government entities. As designation of land changes and the availability of resources changes, the perceived valuation of that land changes. This affects the ability of the local communities to acquire PILT funds. Furthermore, the more cost prohibitive development becomes, the lower the potential return of Mineral Lease and other funds... Recreational activities generally do not generate the level of income, to private sources or to local taxing entities that mineral development and extraction will. Given this, the core emphasis for decision making criteria should be weighted toward the most 'profitable' management practices, i.e., mineral development and extraction. The general tone of the plan is that recreation opportunities always take precedence over mineral extraction. This is in conflict with BLM policy as well as the general plan of Emery County... In relation to fluid minerals development, the general assumption seems to be that the solution to all conflicts is to allow for horizontal drilling or related technologies when conflict arise. This fails to recognize the additional cost and technological challenges associated with this alternative... The Socioeconomic section (4.12 through 4.15.4) also is inadequate in relation to the discussion of the potential impacts to the power generation industry in the area. In fact, the electric Generation Plants located in Huntington, Castle Dale (Hunter) and Price Canyon are only directly addressed one time in the RMP. This is particularly noteworthy because Scottish Power, the parent company of the Utah Power, has been in preliminary discussions and study relating to the addition of 600 Mw generation facility at the Hunter Plant. The potential impact on jobs, water, vistas, and other related issues are woefully inadequate... One of the major concerns that are consistently presented to the representatives of Emery County is the ineffective processes to conduct activities in the PFO. Many comments have been provided that indicate that the processes are impacting the level of use on the BLM administered lands. This is an expansive topic, but some examples that effect the socioeconomic environment are: -Special Use Permits for OHV events - Rights of Way Permitting -River Rafting Permits -Oil and Gas Permits -Mining Claims and Reclamation of Mining. The RMP does not address any efforts to improve the 'customer service' level or the administrative processes involved in using the resources. 2094 and 95 The only alternative that provides a realistic, economics based decision criteria is the No Action Alternative which allows for Discretionary ROWs for specific projects through a permitting process. Alternatives A and D have more limited flexibility, but given the developing gas and energy markets in the area, any restriction on major ROWs that is not based on the individual situation for the ROW is not a beneficial use of the land resource. 2-96 - States that no new Mineral Lease are available to WSAs. The BLM is very aware of the potential development of the Lila Canyon mine and the associated economy benefit of the mine (discussed in 4-7). Despite the fact that BLM recognizes the potential economic benefit of the mine (150 to 200 new jobs) there is insufficient discussion in the RMP about a long term solution to develop the coal resource in this area. We recognize the identified WSA over some of the lease area, but the plan fails to attempt to work a long term solution to the conflicts. 4-11 and 12 discusses the cumulative effects of the various alternatives and makes some assumptions from those alternatives. It is interesting that the Cumulative effects from the No Action alternative are significantly more environmentally severe than the Cumulative effects of Alternative A. This is confusing because the Cumulative effects are results of activities such as mining, minerals extraction, etc., and Alternative A should have more of these activities than the No Action alternative. This does not seem logical and shows a bias against the No Action Alternative... 4-575 discusses the	3) In addition, an Appendix has been added to the Proposed Plan/FEIS summarizing the results of the recent Utah State University public lands survey of local residents, commissioned by the Governor's office; 4) taxes have been addressed; 5) further detail has been provided on power generation facilities; and 6) a more recent evaluation of the oil and gas industries size and how it compares to the other industries has been considered. In addition, a socioeconomic technical description document which meticulously details the methodology, calculations, results and all sources used for the energy production, grazing, and recreation analyses will be provided. Industries that are tied with the energy industry, such as trucking, are included in the IMPLAN analysis as indirect effects under the intermediate consumer classification. Further detail on direct, indirect, and induced effects will be provided in the technical document. Perhaps it is important to also state the Minnesota IMPLAN Group is the company that developed the input/output model IMPLAN used in the socioeconomic analysis in Chapter 4, section 4.6 and the technical description document. The company collected data for both Emery and Carbon counties from the U.S. Census, U.S. Bureau of Economic Analysis, U.S. Department of Labor, and other reputable sources. Minnesota IMPLAN Group did not provide data for counties in the state of Minnesota for the Price RMP. No additional alternatives will be considered. The BLM believes the five alternatives which range from conservation management to complete development along with the No Action Alternative address a reasonable range of alternatives.

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			basis for Significance Criteria and the first criterion is "Substantial gains or losses in pollution and or employment. The term "Substantial" needs to be precisely defined because of the delicate nature of the employment condition in the study area. In section 4-15 it state "Changes in overall employment are not expected (to) exceed 30 jobs so the impacts are not considered significant." 30 jobs added or lost in the departments of each of the counties spend significant time and resources to recruit and build business opportunities that are far less than the 30 positions threshold. Page 4-576 has an error in the third paragraph (below table 4.12-1). It states that the county specific data was obtained from the Minnesota IMPLAN group. I do not believe Minnesota is the correct source of information... On Pages 4-580 and 4-581 discuss the activities relating to Regional Employment under the current management plan. The plan fails to recognize a number of activates and the related employment from those activities in the RMP area. Specifically, the mining and production of Humates (Humic Shale) and the mining and production of Gypsum. Humic Shale is now produced by at least three separate companies from a number of deposits, primarily in South Western Emery County. The production of Humic Shale is currently responsible for approximately 30 full time positions in Emery County. Gypsum continues to be mined on BLM and SITLA lands in the RMP area. On Map 3-16, five existing Gypsum extraction operations are identified by the BLM. Currently, two of these operations continue to operate on a regular basis and extraction. Despite this notation on the map, the socioeconomic impact of existing operations is not discussed in adequate detail the rest of the RMP. 4-582 Impacts to Population. This section contains the socioeconomic impacts of the RMP/EIS and it states that "Activities within the PFO will continue to support a notable number of jobs in the study area. Because these activities are expected to continue under the No Action Alternative, it is not anticipated that continuing current management actions will significantly affect population trends". This is a disappointingly small reference in the RMP to the potential employment impacts of existing industry trends. In some areas, such as oil and gas development, the RMP has the potential to impact employment significantly, particularly over the short term. In the preceding paragraphs, it is pointed out that $9.6 million in Oil and Gas and $29 million in Coal development would be added to the local economy through the No Action Alternative. The monetary impacts of the RMP on all of the other alternatives are inadequately addressed throughout the RMP. 4-585 Impacts to Regional Employment. The document states that "Changes in overall employment are not expected (to) exceed 30 jobs so the impacts are not considered significant." In the current economic environment in Emery County and Carbon County, the subtraction or addition of 30 positions would constitute a significant impact on employment. Currently, the unemployment rate in Emery County is approximately 9%.In the past 12 months, the rate has been as high as 11%. The addition of 30 positions in this community, with the multiplier effect of employment providing additional support and service jobs, these 30 positions could equate to a reduction in the unemployment rate of 1 to 2 percent. The same argument is even more resounding in section 4.15.4. where a reduction of as much as 70 part and full time jobs could be lost. This would potentially provide a devastating impact on the current economy. Generally, throughout section 4.12, Socioeconomics, there is a failure to address the potential impacts of the Guides and Outfitters for all of the Alternatives. Currently there are approximately 40 permitted land outfitters in the study area and an additional 80 on the Green River on the Eastern edge of the study area. These existing businesses employ approximately 100 on a full or part time basis during peak seasons.	
Michael	McCandless	Soil, Water and Riparian	Page 4-8 discusses current water projects under discussion. There are additional projects under discussion in the study area including a 3500 acre foot storage reservoir on the Huntington Creek and a possible storage reservoir near Ferron for additional water storage for Utah Power and Light.	The scenarios for analysis have been updated.
Michael	McCandless	Transportation and Access	EXISTING AIRSTRIPS - There are 4 existing airstrips mentioned in the RMP, but without adequate details on the proposed management of these structures. In addition, the RMP does not mention the additional 7 to 11 existing airstrips in the RMP area. (The number varies depending on the definition of an airstrip and may include a couple	Please see general comment response #21

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			on state or private land.) Given the significant amount of use that these backcountry airstrips are now seeing, it is important that the RMP deals with the recreational and public safety issues related to keeping these sited open for use. Backcountry airstrips provide a potential economic opportunity to Carbon and Emery Counties, and the remote nature of this area requires adequate facilities for search and rescue and fire fighting. Because of the importance of this type of use, it is critical that the BLM consider the following concepts for the RMP: 1.Continue to allow the use of existing airstrips for backcountry recreation under the classification of "Casual Use". 2.Consider creation of a separate designation for backcountry airplanes so that the restrictions for motorized use are dealt with separately from OHVs and other traditional motorized vehicles. Technically speaking, under current rules it could be interpreted that the airstrips are off limits to the pilots unless the airstrips are designated routes as part of the route designation plans. A separate designation may be needed to clarify the distinction. 3.Include a process for the pilots to 'legitimize' the individual existing airstrips through the RMP at the activity level following the completion of the RMP. They should allow them to provide basic maintenance and support of these facilities without EIS documents or significant EA work... Page 4-579 states that "Estimates of recreational use within the Price Field Office indicate that there may be several hundred thousand Recreational Visitors Days spent in this area." In the following paragraph it states that "Quantification of the economic stimulus associated with recreation in the PFO is not possible at this time due to a lack of verifiable data on recreational use." It is somewhat disappointing that an undertaking as substantial as the RMP is being considered when the agency admits that they have insufficient data to accurately assess the benefits/impacts of the present management plan.	
Michael	McCandless	Wild and Scenic Rivers	The qualification for the three designations, Wild, Scenic, and Recreational, should be universal regardless of the management that is applied... The only way for BLM to change the proposed designation of the section of river is to change the definition of what qualifies for "Wild" or "Scenic". Either the sections of river qualify under a set of established criteria, or they do not. Under any circumstance, the BLM should not change the qualifications or definitions of the terms to fit what they would like to see applied to the area.	Please see general comment response #28
Meredythe	McCarthy	Minerals and Energy Resources	DO NOT sacrifice redrock wildlands to oil and gas development.	Please see general comment responses #18 and #101
William	McCarvill	Minerals and Energy Resources	There is an inadequate range of alternatives. It is clear that a decision was made to open as much of these lands as possible to extractive use, primarily oil, gas and coal exploitation. There is not an alternative where extraction is substantially minimized and other uses emphasized. In all cases the acres open for drilling is substantially the same number. We think that lands identified by citizens (the UWC proposal) should not be open for oil and gas development.	Please see general comment response #18 and #101
William	McCarvill	Minerals and Energy Resources	Outdoor activities will be degraded by uncontrolled OHV use and the roads, drill pads, and pumps used for hydrocarbon exploration and extraction. Of the alternatives offered, we prefer alternative C, but we feel that this alternative does not go far enough in restricting hydrocarbon leasing to those lands identified in the citizen's proposal.	Please see general comment responses #18 and #101
William	McCarvill	OHV Route Identification	OHV routes should be designated in all of the Price Resource Area through travel plans like the San Rafael Travel Plan.	Please see general comment response #19
Ben and Karen	McClinton and Rosenbaum	OHV Route Identification	We urge the BLM to designate a system of trails that the BLM can enforce and to eliminate off-trail, cross-country travel altogether.	Please see general comment response #19
Ben and Karen	McClinton and	Process and Procedures	We are Utah natives who maintain family and financial ties to Utah, and we believe that the wild and beautiful land we love should be protected and preserved. We ache when we see the loss of wilderness in Utah to	Please see general comment response #35

First Name	Last Name	Category	Comment	Response
	Rosenbaum		development and to the ravages of the oil and gas interests. And we cringe when we see pristine land ruined by off-road vehicle use. That's why we urge the BLM to choose the Castle Country Heritage Plan as a balance between the competing interests of preservation and development.	
Ben and Karen	McClinton and Rosenbaum	Wilderness	We also urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. Please do not allow companies to lease, explore for oil and gas, and ultimately develop these lands. Your observations confirm that these activities will ruin the wilderness values of this special area, degrade water quality, cause harmful soil erosion, endanger wildlife habitat, and destroys rare but essential riparian areas that should be protected. Please use your stewardship of these precious lands to protect and preserve them for the enjoyment of all Americans and not just local users and business interests.	Please see general comment responses #18, #36 and #101
Rayo	McCollough	OHV Route Identification	I am very concerned that the draft RMP will open up large areas to ATVs and dirt bikes. Unlike other forms of public recreation and use, the scars left by off road recreation take generations to heal. I have seen the devastation to public land that unregulated off road use allows. There are so few areas left where the sights and sounds ATVs and dirt bikes can't be heard/seen. Please don't designate any areas where unrestricted off road use is allowed. There are thousands of miles of roads that can be utilized by off roaders without further damaging the land. Please minimize the impacts to any proposed off road route.	Please see general comment response #19
Rayo	McCollough	Wilderness	Please protect all wilderness areas (America's Redrock Wilderness Act land and wilderness study areas like Sids Mountain) from any kind on development (oil and gas or ORVs). The small amount of energy that can be extracted isn't worth losing the few wilderness areas left in Utah. Riparian areas are especially sensitive to damage in Utah. Most wildlife depend on these areas for survival. ATVs and dirt bikes can destroy a steam's ecosystem in a day.	Please see general comment responses #3 and #36
BreAnne	McConkie	Minerals and Energy Resources	I would like to see the citizen's proposed wilderness lands protected from privatization and development by oil and gas companies	Please see general comment responses #36 and #101
BreAnne	McConkie	OHV Route Identification	I would like to see the citizen's proposed wilderness lands protected from destruction by unrestrained off road vehicles. By designating them as citizen proposed wilderness areas and creating designated ORV routes outside of the citizen's proposed wilderness, along with a better enforcement of violators of the current ORV regulations	Please see general comment response #12
Katherine & Michael	McCoy	Minerals and Energy Resources	If the industry made a genuine and effective effort develop TREAD LIGHTLY processes, some areas in the PRICE RMP could be possible candidates. But unfortunately this is not currently in the industry's DNA and your agency shows no inclination to enforce environmentally sound drilling. Go look at the "Lisbon Industrial Area" south of Moab if you need to refresh your memory about the casual and blatant ruination that oil and gas create.	Please see general comment response #18
Katherine & Michael	McCoy	OHV Route Identification	ORVs do not mix with any other user type (horsemen, hikers, mountain bikers, even jeepers). ORVs ruin and ENDANGER the back country experience for everyone else with their incompatible speed, noise, exhaust and dust. The environmental impact statement must fully analyze this. "Open areas" where ORV use is allowed without limitation turn into sacrifice areas that wind up being shunned by everyone, including ORV enthusiasts after they have blazed too many trails.	Please see general comment responses #19 and #79
Jon	McEvers	Minerals and Energy	Natural Gas is the future for the world's energy. If the government makes it too costly or difficult to drill and produce natural gas out of a productive reservoir, operators simply will find other areas to put their capital. The	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
		Resources	United States is slowly realizing their dependence on imported oil. Our economy is tied directly to oil and gas. We need to begin the migration from being so dependent on oil and begin understanding the future of natural gas. I feel the current Draft RMP/EIS is a knee jerk reaction and needs to be further researched.	
Kurt	McFarlane	Alternative Maps	The BLM contradicts itself in many places. It says the Chimney Rock trail system will be designated open but it is not marked on the Preferred Alternative Map. The BLM maps must be updated to accurately portray the OHV designations outlined in each alternative.	Please see general comment responses #20 and #31
Kurt	McFarlane	OHV Route Identification	All trails open to OHVs on San Rafael must remain open. The BLM has already closed way to many roads and trails. Me and my family use the trails on the desert very often. Junes bottom was one of our favorite rides now it's closed and should be opened. Pine canyon to the Indian paintings should be opened back up, it is a road into them that was closed. Behind the Reef trail was the best trail on the desert until the part down the river was closed. The road to Spring and Nates canyon should be reopened. The BLM made WSAs in areas where roads have been since Before I was born. Saddle Horse canyon should have been left open. Do not close the few trials that are open now. Cow & Calf Canyon Top NW. Devils Race track, Fix it Pass must remain open. It is insane of the BLM to close down any more trails. If all the trails are closed down then people will quit respecting the land and go where ever they want to regardless of the WSA signs all over. My family uses the trails on the San Rafael and Mounds area all the time and we will be impacted greatly by the BLMs choice to close down trails and roads. As we were by the last road closures a couple years ago. Do not let SUWA influence you into closing down our trails. We need our trails left open.	Please see general comment response #19
Kurt	McFarlane	OHV Route Identification	It is hard for me to understand why the roads I have used my entire life are now closed. Junes Bottom, Road to Pine Canyon, Saddle horse, Sids leap, and many more. BLM states the San Rafael Route Designation Plan will be incorporated into the new management plan, but I have heard that the BLM will close many of these trails, at the BLM meeting in Price I was told that the San Rafael Plan will stand as is. This better be the case because all at the meeting were told of it would stay as it is. The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment response #20
Kurt	McFarlane	OHV Route Identification	The group size thing you are trying to put in is silly and stupid.	Please see general comment response #81
Kurt	McFarlane	Process and Procedures	The BLM proposed many overlapping management layers in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, are not drawn along any recognizable geographic boundary making compliance virtually impossible. Some one who uses these trails and land should draw the maps. Not someone in the office who makes no sense with their drawings. We do not need or want these over layers. We do not need WSA we can manage the land without locking it up.	Please see general comment response #37
Carolyn	McGaughey	Transportation and Access	I would like to comment on the possible closure of some of the backcountry airstrips in your beautiful state. I am a pilot, and also an avid tourist. I had the rare pleasure of being flown to some of your wonderful strips by Jim Wark, a well known backcountry pilot. Though I've been very fortunate in my travels, I can say that the beauty and the excitement of that flight is the highlight of my life. I could not possibly have hiked where all we went, and to see the incredibly beautiful canyonlands from above is beyond my words to describe. I DO have much of the trip on film, both video and still camera shots. I have shared them with many people and all find it very special, indeed. I am very aware of how the UTAH backcountry pilots care for these strips. I read about this on the Aero News Network Journal on the web and many are saddened by the possible loss of something so valued and unique as	Please see general comment response #21 and #80

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			a way for people like me to see the wonders and natural beauties that would never be possible in any other way. Lucky are the young/healthy who can. I am sad for us that certain voices could deprive us of visiting such places because we are older/not so strong.... Airplanes, especially the small ones who would visit these airstrips, make only a few seconds of noise, and require only a few hundred feet to leave their small tracks. Then there is that one day when an airplane and backcountry pilot may save the life of a hiker in trouble. Thank you for your time, and I hope that one of my grandchildren might be able to fly in to Mexican Mountain Airstrip one day.	
Martin	McGregor	Wild and Scenic Rivers	I still think part of the Price River between Mounds and Woodside could be classified as wild. If you revise the RMP, mileages could be added to the river segment classifications.	Please see general comment response #25
Martin	McGregor	Wilderness	I hope that all of these are managed as potential wilderness areas. This means that they become closed to OHVs and subject to a suitable travel plan similar to the San Rafael area.	Please see general comment response #108
Heidi	McIntosh	Process and Procedures	We believe the only realistic way to remedy the deficiencies is to withdraw the entire document and release it again after it is reworked and accurately notifies the public of BLM's preferred alternative. In the alternative, we request that you extend the October 15, 2004 deadline for submitting public comments another 90 days to allow the public to obtain accurate information about the BLM's new approach to ORV management and route designation, and to provide a well informed response to the draft RMP.	The 90-day public comment period was extended for an additional 45 days, closing on November 29, 2004. The 135-day public comment period allowed the public to review BLM's OHV and route designation process. Also see general comment responses #143 and #145.
Heidi	McIntosh	Process and Procedures	The resource specialist in the Price field office responsible for ORVs just now obtained a copy of SUWA's Route Designation Proposal for ORVs, which we hand delivered to Floyd Johnson at the Price office in the spring of 2003... This is further reason to provide an extension of the comment deadline or withdrawal of the document pending additional work on the draft.	The 90-day public comment period was extended for an additional 45 days, closing on November 29, 2004. The 135-day public comment period allowed the public to review BLM's OHV and route designation process. Also see general comment response #145.
Scott	McKay	Recreation	Please designate as much area as you can to non-motorized recreation, like hiking.	Please see general comment response #15
Colleen	McKeage	Transportation and Access	My family and I fly several times a year to back country airstrips allover the country and would like to express our support in keeping the Mexican Mountain Hidden Splendor Cedar Mountain Sage Brush Flat/Peter's Point Horseshoe Canyon Stone Cabin Gas Field Sagebrush Bench Cliffdweller Flat Gruvers Mesa Sweetwater Reef Temple Wash open for continued use by small recreational aircraft. We are like everyone else and enjoy camping and hiking in remote areas, we just access them by air which is probably less impact than vehicles. With all the freedoms that we are now at risk of losing in our country due to terrorism and fear, I would strongly hope that this would not be one of them. It is truly a special privilege to fly to these back country airstrips and spend time in the wilderness.	Please see general comment response #21
John	McKenna	Transportation and Access	I would like to let you know that we have reviewed your documents on the upcoming travel plan and we like the fact that Alt. D. includes the continued use of the airstrips at Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sage Brush Flat or Peters Point. I would hope that these strips continue to be available as they provide an outstanding trailhead for a group of folks that access them in one of the least intrusive methods that I am aware of not to mention environmentally	Please see general comment response #21

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			friendly modes of access.	
Damon	McLaughlin	Minerals and Energy Resources	Though I understand the need for resources, I am also aware that we need more than just a few months' worth, a more than modest estimation of what will be gained from drilling in Utah. Clearly, the insufficient oil and gas that can be drawn from American's Redrock Wilderness is symptomatic of a myopic plan for acquiring energy for this great nation, a nation built with foresight and wisdom of which, like energy, it's apparently run out.	Please see general comment responses #18, #36 and #101
Lila	McPharlin	Process and Procedures	I would also urge the adoption of the Castle County Heritage Plan for OHV Route Designations as it not only provides public access to incredibly remote and scenic areas but it protects more fragile areas as well.	Please see general comment response #35
David	McQueary	OHV Route Identification	I would like to see roads and trails open to all responsible users no matter how they choose to travel (hike, horse, OHV, 4x4, or bicycle). Each group would like to see their method of travel be the only way, however this is public land and should be open to the public with as little restriction as possible while still providing protection for the resource. Every group has a few "Bad Apples", people who disregard laws and common sense. Unfortunately laws and rules put in place to solve problems caused by these bad apples usually only serves to drive the courteous, law abiding groups away, leaving only the problem people.	Please see general comment response #19
David	McQueary	Process and Procedures	One final comment, layers of bureaucracy and elaborate plans and restrictions make it very difficult to understand and follow the laws and rules. It is extremely difficult to decipher hundreds of pages of documentation and poorly made maps to figure out what is and is not acceptable on any given piece of public land. PLEASE KEEP IT CLEAR AND SIMPLE, PROVIDE ACCURATE AND DETAILED MAPS SO THAT RECREATIONALISTS CAN UNDERSTAND THE RULES THAT THE BLM SETS. I look forward to many more trips to the Price area, I hope that there will always be an opportunity for all types of recreation there. Thank you for your time and consideration of my comments.	Please see general comment responses #37 and #123
David	McQueary	Recreation	Camping restrictions are another concern. The freedom to get away from the crowded campgrounds is very important to me. I feel that further restrictions are not warranted except in the most sensitive areas. In my experience the vast majority of people out there using the public lands are very respectful, and would never do anything that would harm the land, waters, or wildlife. As usual it is the small minority who don't care that get all of the attention and ruin things for the rest of us	Please see general comment response #81
Richard	McSwain	Minerals and Energy Resources	I do not feel we need to open areas to oil and gas exploration at this time or any time soon. This region has very little energy resource available and much of natural value to loose with such exploration.	Please see general comment response #18
Richard	McSwain	OHV Route Identification	ORV's (OHV's) have much of the western landscape now available to them. I don't believe they need more. I urge you to protect the most fragile and special areas from them. Please don't designate OHV routes within the proposed Redrock Wilderness Act boundaries, particularly within proposed Wilderness Study Areas. It is my understanding the Castle County Heritage Plan still provides for almost 2900 miles of OHV designated routes. This I believe is sufficient, at least for many years, for their use.	Please see general comment responses #12, #35 and #36
Richard	McSwain	Process and Procedures	I believe the Price RMP should include as much of the content of the Castle County Heritage Plan as possible. I believe it offers a good balance between the various competing uses. Please abide by as much of this plan as you can in your final draft.	Please see general comment response #35
Richard	McSwain	Wilderness	As stated above, please protect wilderness quality lands within the region. This includes all Wilderness Study Areas and other special areas including: those in the San Rafael Swell like Behind the Reef, and San Rafael	Please see general comment response #36

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			Knob; also Chimney Rock and the proposed wilderness around the Price River.	
James	McVey	OHV Route Identification	I urge you to protect special places from scars and other damage done by ORVs, especially within Wildness Study Areas and other lands within America's Redrock Wilderness Act. I urge you to protect Chimney Rock, Behind the Reef, the Price River Proposal Area, and San Rafael Knob.	Please see general comment responses #12 and #36
Kathleen	Means	Minerals and Energy Resources	There is no reason to drill in Nine Mile Canyon. It has been proven that the oil and gas is not worth the destruction of our wilderness or our native American heritage.	Please see general comment responses #1 and #18
Julie	Medbery	Minerals and Energy Resources	Please help us to protect America's national heritage of wilderness lands for all generations to come. The short-range profit from mining and gas exploitation is minimal compared to what could be lost. The public land and the 80 of the potentially affected areas belong to all Americans, and should be kept free of exploitation and preserved for everyone to enjoy.	Please see general comment response #101
Rosemary	Meier	Minerals and Energy Resources	Please ask the Bureau of Land Management to protect the Utah Redrock Canyonlands from oil and gas drilling and over use of Off Road Vehicles (ORVs). We need to protect our national heritage of wilderness lands for all generations to come. The short-range profit from mining and gas exploitation is minimal compared to what is being lost.	Please see general comment response #101
Garrett	Meigs	Minerals and Energy Resources	I think this plan seems far from balanced, and it sacrifices far too many acres of our public land to oil and gas drilling interests.	Please see general comment response #18
Garrett	Meigs	Wilderness	Please reconsider and allocate more acreage as protected wilderness.	Please see general comment response #120
Bethany	Menkart	Minerals and Energy Resources	We DO NOT NEED more development for greed-driven corporations, masquerading as concerns for energy for this country when renewable energy sources are much more viable and less damaging - please protect the Red Rock Wilderness, and do not desecrate it for oil and gas companies. Conservation and protection are the answer, NOT development!	Please see general comment response #101
David	Merriam	OHV Route Identification	I am very distress that you feel the need to restrict the size of groups in the Swell area, what is wrong with the 50 vehicle limit? How many times are there that many vehicles much less more? I think that is very unfair. Who decides that one group is too big or has too many vehicles? And the trail restrictions are abysmal. You throw us a bone and give SUWA the world.	Please see general comment response #81
Amanda	Metz	Minerals and Energy Resources	Leasing this land for oil and gas would yield limited profits for the industry, but damage the land permanently.	Please see general comment responses #1 and #18
Gary	Meunier	Minerals and Energy Resources	Comparative environmental consequences should be clearly assessed among the alternatives, with mitigation measures and the processes for their implementation (staffing and funding) fully disclosed, including summarization in the Executive Summary. Important long-term resource values (e.g., wilderness and wildlife habitat) should not be sacrificed for short-term extraction. Development should not be rushed into willy-nilly, but rather be staged gradually to establish and demonstrate the impacts of development and to continuously refine and improve the effectiveness of mitigation and restoration measures. Remember that these energy resources that exist now, once they are extracted, are lost forever; some may be of even more value at some point in the future.	Table 2-24 of the Proposed RMP/Final EIS summarizes the impacts of the alternative in comparative fashion. The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities for OHV use and mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of OHV use and mineral development. Development level NEPA documents with site-

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				specific mitigation requirements would be prepared should development of leases be proposed.
Gary	Meunier	OHV Route Identification	Comparative environmental consequences should be clearly assessed among the alternatives, with mitigation measures and the processes for their implementation (staffing and funding) fully disclosed, including summarization in the Executive Summary. Unauthorized use and the means to enforce restrictions must be realistically assessed. As mentioned above, I visited the Wedge Overlook in 2001; I subsequently visited the same area in 2004. It was clear that in those 3 years, OHV use has extended significantly off of the roads in that area. Therefore, better enforcement is needed and any new route designations need to be carefully considered with respect to resource impacts and the difficulties of enforcement of rules and restrictions, in terms of staffing, funding, and practical implementation. Monitoring and enforcement need to be in place ahead of increases in OHV use and access, not struggling to play "catch-up."	Please see general comment responses #15 and #19
Gary	Meunier	Process and Procedures	The Executive Summary fails to summarize the EIS's findings with respect to the environmental consequences of the alternatives, including environmental effects and their mitigation, the relationship between short-term uses and long-term productivity, and irreversible commitments of resources. These should be summarized for each alternative in such a way as to facilitate comparisons between the alternatives for both decision-makers and the public - otherwise how can comparative environmental consequences fully inform any decisions?	Table 2-24 of the Proposed RMP/Final EIS summarizes the impacts of the alternatives in comparative fashion.
Gary	Meunier	Process and Procedures	The Executive Summary's Purpose and Need section and the associated graphic box, as well as the remainder of the summary appear to emphasize energy development and intensive recreation and fail to reflect FLPMA's Declaration of Policy (Section 102) items 7 and 8 requiring management of these public lands "on the basis of multiple use and sustained yield" and "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values . . ." More emphasis needs to be placed on the sustenance and protection of long-term resource values, and more comparative analysis on potential impacts to these values needs to be provided to inform decision-making. Appropriate mitigation, protective, and restorative measures to reduce such impacts should be described.	Please see general comment responses #1 and #30
Gary	Meunier	Process and Procedures	The BLM's ability, including funding and staffing, to monitor and enforce such mitigation, protective, and restorative measures should be disclosed. It is very important that this Resource Management Plan and its implementation not really be only, in effect, primarily a short-term Resource Extraction Plan (for energy development) and Resource Destruction Plan (for uncontrolled recreational vehicle use).	BLM will seek to obtain funding for implementation and mitigation of the selected alternative. Because funding is provided by Congress, it is beyond BLM's control. BLM has assumed that because Congress has directed the BLM to manage public land, it would continue to fund it adequately to protect the health and safety of the public and the resource values on the public lands. See general comment response #147. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on the public lands.

First Name	Last Name	Category	Comment	Response
Gary	Meunier	Process and Procedures	For protection of resource values for future generations, please incorporate as many elements of Alternative C (maximum conservation) as reasonably practicable, with strong provisions for impact mitigation and the necessary processes and funding for implementation of mitigation measures (preferably to be funded by the impacting entities and not by the general public or non-impacting users).	Please see general comment response #2
Kiley	Mickelsen	OHV Route Identification	I'm writing as a native Utahan who is deeply concerned about the diminishing wilderness in my home state. I believe that vehicles should be restricted to designated roads and trails throughout the entire state. I think there should be a "closed until posted open" policy. There needs to be adequate opportunity for both motorized and non-motorized recreation, while avoiding conflicts between these two groups.	Please see general comment response #19
Paul	Mickelson	Transportation and Access	Thank you for allowing continued use of the airstrips in the Price area. The backcountry strips are a wonderful recreational resource which enable us to gain access to scenic areas without the use of high impact ATVs, loud motorcycles, or expensive gas guzzling RV's.	Please see general comment response #21
Paul	Mickelson	Transportation and Access	With the road access granted at Grand Gulch, I notice more vandalism, trash and loss of artifact every year when we visit Grand Gulch mine.	Although there is a vast network of trails in the planning area, BLM tries to protect the integrity of resources to the extent possible. BLM continues to monitor, enforce, and educate trail users to limit resource degradation. Under any of the RMP alternatives specific problems could be corrected because BLM would have the authority to close routes that cause resource damage or no longer serve any purpose.
Paul	Mickelson	Transportation and Access	My point with all this is that discrimination against aircraft access vs. other vehicles is impossible for me to understand. I also think that anyone who has hiked a popular trail used by horses mules and people with battery powered boom boxes would prefer small aircraft flown by responsible persons, as would any one looking for an outdoor experience who gets confronted with the noise and fumes from motorcycles and ATV's. Thank you for considering my point of view. I hope this beautiful resource in the your area will remain open to those of us who want to visit with small aircraft.	Please see general comment response #21
Mike	Milius	Minerals and Energy Resources	I urge you to abandon your draft plan calling for the sacrifice of the two and a half million acres managed by the Bureau of Land Management Price Field Office to oil and gas development. Please protect our public lands from the irreversible harm that oil and gas drilling would surely inflict, and from and further damage from off-road vehicle activity... On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including realistic wilderness preservation. Preserve the wilderness! Energy production is important - but economic dominance will not benefit us if we sacrifice the health and beauty of the earth to achieve it.	Please see general comment response #18
Dennis	Miller	OHV Route Identification	I think it's very important to keep these trails open for OHV access, for the benefit of people who are unable to hike due to health issues or handicap restrictions. I don't think that those of us that abide by the rules and stay on the designated trails should have to pay the price for those irresponsible people that don't. We as a local ATV group, like to get out in the mountains and we do our part in cleaning up trash and reminding people to stay on the trail as we go. Everyone has the right to enjoy the benefits of the great outdoors, for those intolerant individuals who are bothered by other recreationists, they need to realize the rights of everyone. As long as a person is abiding by the laws, they have as much right to be there as anyone else. We all need to do our part in	Please see general comment response #19, #80 and #132

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			being responsible for the environment. Having the freedom of riding ATV's gives the older generation the opportunity to get out and enjoy nature, and the beautiful Utah scenery, and contribute to the local tourist economy. Thank you for the opportunity to allow input on this matter.	
Jack	Miller	Process and Procedures	Please support the Castle County Heritage Plan and justify our stewardship of these lands.	Please see general comment response #35
Jack	Miller	Wilderness	As you are considering the above document, I wanted to urge your consideration of the following points: As you know, this is a very delicate area and as such is easily damaged. As a result ORV traffic should not be allowed to penetrate WSA's. In fact, all areas of proposed wilderness should be protected as the oil they hold is minimal at best. Several years ago I traveled down Desolation canyon and the thought of that beautiful land being degraded by roads and drilling rigs suggests a decision that helps define our worth as a nation.	Please see general comment response #22
M. Stephen	Miller	Minerals and Energy Resources	I wish to go on record opposing the opening up of the Mexican Mountain area of the San Rafael Swell to exploration of any kind. I spent some days hiking around the mountain two years ago and found the presence of a simple landing strip already intrusive. I believe that ANY FURTHER DEVELOPMENT in or around Mexican Mountain would totally destroy any backcountry experience there, and in a large surrounding area. Please do not allow any further development here.	Please see general comment response #18,21, and #36
Michele	Miller	Minerals and Energy Resources	I am writing to state my strong opposition to oil and gas development in the planning area covered by the Price Draft RMP/EIS. Future land decisions should not be influenced by the short term economic objectives of the oil and gas industry. I believe that it is your responsibility to protect these lands and its inhabitants for the use and enjoyment of future generations. It is well known that air, water and soil quality, as well as wildlife habitats will be negatively impacted by oil and gas development. The BLM should resist the efforts of industry lobbyists to exploit this area of priceless natural resources.	Please see general comment responses #1 and #18
Pam	Miller	ACEC	6. ACEC protection should be afforded to Nine Mile Canyon in addition to its 1995 Management Plan. However, none of the alternatives on pages 2-124 and 2-125 go far enough in the management prescriptions. Rather than "no surface occupancy" in Alternative C, there should be no leases for oil and gas in the boundaries recommended. Also, the area should be closed to disposal of mineral materials. Oil and gas development should not be permitted within the boundaries of the proposed ACEC. Mineral development is in direct conflict with VRM Class II values. No exceptions should be granted to these prescriptions.	Please see general comment response #154
Pam	Miller	Cultural Resources	My primary area of concern is Nine Mile Canyon, which is mentioned frequently in the RMP. None of the alternatives offer the measure of protection that Nine Mile should be experiencing now under the 1995 Recreation and Cultural Area Management Plan. One of the primary goals of the RMP for Nine Mile Canyon should be the implementation of the 1995 management plan. The boundaries of the area should be those of the proposed national register district for the canyon. These are in Alternative C. There are other details in Alternative C that make it a better choice for the Nine Mile Canyon area than the preferred Alternative D: Cultural resources inventories need to be required for areas of direct impact, plus a 300-foot area of potential effect extending beyond the impact area. This is the minimum area needed to mitigate visual impact in addition to residual impact involving work crews, dust from industrial vehicles, and impacts of increased access by the public.	Please see general comment responses #9, #13, and #154
Pam	Miller	Cultural Resources	7. On page 4-92, the Significance Criteria section for Cultural Resources describes impacts to cultural resources that would be considered significant when management actions or other actions occur that are reasonably associated with those actions result in unmitigated damage to cultural resources protected by either federal or	Please see general comment responses #9 and #13

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			sate law. It is interesting that one example of an adverse effect includes: “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Industrial vehicle traffic in Nine Mile Canyon introduces dust as an element that diminishes the integrity of the canyon's significant historic (and prehistoric) features. The vehicles also introduce noise. The compressor stations are examples of audible and visual elements that diminish the integrity of the canyon's features. The relatively new gas well near Red Man Village is another example of a visual element that impacts or diminishes the integrity of the canyon's significant historic and prehistoric features.	
Pam	Miller	Cultural Resources	10. Listing of Nine Mile Canyon by the National Trust for Historic Preservation as one of America's 11 Most Endangered Historic Places should be a wake-up call to all of us who are concerned about the Canyon and a catalyst to secure resources to manage the area as an endangered place. Again, BLM can call on partner groups and make additional partners in preserving and protecting Nine Mile Canyon.	The BLM recognizes the cultural resources in the Nine Mile Canyon area. Management prescriptions have been developed to address the variety of resources and uses within the canyon, cross-jurisdictional decisions, valid existing rights, and private-public land ownership patterns. Additionally, continuing to implement the 1995 Recreation and Cultural Area Management Plan allows for cooperation with local governments and other interested organizations in protecting cultural resources on BLM administered lands in Nine Mile canyon.
Pam	Miller	Minerals and Energy Resources	3. On page 2-81 none of the alternatives protect Nine Mile Canyon from oil and gas leasing. Alternative C offers "no surface occupancy", but this is false assurance. Kent Hoffman of the BLM State Office told the audience at the Wallace Stegner Symposium at the University of Utah recently that "no surface occupancy" designations are waivable. Although he said the BLM would have to have a good reason to do so, we have seen cases in the past with Nine Mile Canyon and BBC where BLM has waived designations or protections with less than compelling reasoning. The best protection for Nine Mile Canyon and the proposed SRMA would be no oil and gas leasing within the boundaries of the proposed national register district. The canyon is very narrow and it would be very difficult to place a gas well or any industrial development where it would not impact archaeology or historic sites or the visual qualities of the canyon. Because some wells and compressor stations have been located within the canyon in the past is no reason to increase the destruction or the impact. This is faulty logic. The amount of gas to be taken from such a small number of wells that could potentially be located there is very small comparatively and economically short-sighted considering the tourism and recreation values of the canyon that would be forever impacted by such action. Nine Mile Canyon should be closed to leasing and be recommended for withdrawal from general land laws (see 2-101).	Please see general comment responses #9, #13 and #18
Pam	Miller	Minerals and Energy Resources	5. Under Alternative C, p. 2-101, Nine Mile Canyon should be closed for mineral materials disposal. This should be adopted for the final plan.	Please see general comment response #18
Pam	Miller	Process and Procedures	In general the RMP is weighted heavily to mineral resource development, usually at the cost of other resources and values in the Price Field Office area. I hope the final decision on this RMP will provide the means to manage lands in a balanced way that does not select for mineral resource development at the cost of the resources so important to our local economy such as tourism development and recreation. Mineral development, such as leases in Nine Mile Canyon proper, is short-sighted in face of the potential damage to cultural resources and the	Please see general comment response #1

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			development of Nine Mile Canyon as a tourist attraction. There is a way for BLM to consider the long-range impacts of mineral development; that would be the environmental impact statement approach. This is a much needed approach to the management of Nine Mile Canyon and adjacent areas instead of the past "piece-meal" approach of environmental assessments for individual projects experienced during the past two years. It is important for the BLM to set firm policy and management practices that will prevent local management from abdicating in the face of special interest pressure.	
Pam	Miller	Recreation	4. Alternative B and C both state the purpose of the Nine Mile Canyon SRMA (2-81). It is important that this purpose be included in whichever alternative the BLM finally selects for the RMP. An important part of this statement is the section that states "including the provision of a safe recreating environment." Nine Mile Canyon has not been safe for recreating since the beginning of industrial activity in the canyon and adjacent areas. The machinery and trucks using the canyon road are degrading other resources. Despite the watering and magnesium chloride, the road has never been in worse shape in the history of my 30 years of visiting the canyon. Gas developers should be held to stricter standards and they should be enforced for public safety.	Please see general comment response #117
Pam	Miller	Visual Resources	2. Nine Mile Canyon, because of its National Backcountry Byway status, must be managed as a VRM class II. The proposal to allow downgrading to VRM class III (page 2-82) in some areas as proposed in Alternative C (and others) is not acceptable or in keeping with the byway status or the proposed national register district. The other alternatives offer even less protection and should not be acceptable alternatives. Allowing VRM class III in Nine Mile Canyon would impact the scenic, historic, and prehistoric values that Nine Mile Canyon is famous for.	Please see general comment responses #140 and 154
Ray	Miller	Minerals and Energy Resources	I am writing to ask that BLM refrain from offering oil and gas leases in proposed wilderness areas.	Please see general comment response #101
Ray	Miller	OHV Route Identification	The travel plans should designate motorized routes only where conflicts with other users do not exist, and include effective enforcement plans. They should provide for evaluation of ORV impacts on all resources and users in a planning area. The travel plans should implement effective monitoring of ORV impacts and set clear thresholds which, if exceeded, trigger closure to ORV use. If BLM cannot accomplish effective monitoring and enforcement, ORV use should not be allowed.	Please see general comment response #19 and #154
Susan	Miller	OHV Route Identification	On a positive note, I support the proposals from your office to restrict cross-country off road vehicle use and to designate specific ORV trails, provided thorough environmental studies show that their use is appropriate. But opening up new areas like the trail to the top of the Book Cliffs for ORV's, which your plan proposes, should be rejected. In addition, realistic and effective plans for enforcing ORV protections must also be developed.	Please see general comment responses #15 and #19
Carole	Milligan	Transportation and Access	There are many other airstrips as well within your management area and I would request that you either mention them directly in the plan or that you include some language that would protect casual usage of these airstrips in the future.	Please see general comment response #21
Bonnie	Million	Minerals and Energy Resources	It is vitally important to protect this area from drilling that destroys the landscape, threatens habitat, and results, in every case of success, a pool of dead land around the site. This kind of policy is stupid and we, as a people, are resisting.	Please see general comment response #18
Steve and Candy	Milner	OHV Route Identification	Public access to open lands are a must to keep available to all the public, not just a privilege few. Yes, there are individuals that do not protect and preserve our beautiful lands and waters, mostly due to immaturity, un-education or lack of respect for others. But I urge you to not close areas due to what they ride or where they camp. Those individuals that fail to care, should be the ones restricted, so let's not punish all. To close land to all the thousands of responsible users would be the greatest travesty.	Please see general comment response #19

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			It is because of these issues and concerns that I have joined groups like USA-ALL and the Utah Trail Machine Association (UTMA) and ask with them, please do not close down the trail systems in and around the Price area. I've still got more grandchildren to show off this beautiful land too and to teach them to respect it.	
Michael	Milovich	Minerals and Energy Resources	The Carbon County Commission requests that the BLM add into the environmental impact statement and further into the new land use plan of both the Price and Vernal Field offices, language that will allow both Carbon and Duchesne Counties access and allowance at no cost to the counties, to extract asphalt reserves that might be located on federal lands for purposes of road paving and maintenance of country roads.	Asphalt reserves, tar sand, and oil shale are leasable minerals. It is BLM's policy to make these materials available to the public and local governmental agencies whenever possible and wherever environmentally acceptable (see Draft EIS Maps 2-37 through 2-41 for areas closed to mineral material disposal due to resource conflicts). BLM sells mineral materials to the public at fair market value, but gives them free to states, counties, or other government entities for public projects. Asphalt, tar sand and oil shale are subject to the combined hydrocarbon leasing regulations, 43 CFR 3140, and cannot be disposed as a saleable mineral (mineral material) like regular sand and gravel. The counties would have to purchase leases for these materials according to the required leasing procedures.
Mary	Minton Davis	Wilderness	I was fortunate to see a video of some of the beautiful areas of your state. I have flown across the US from Nashville to San Francisco to visit my first grandchild and have seen part of America's Redrock Wilderness Area from the air. I hope to visit some of these majestic areas like Desolation Canyon, Nine Mile Canyon, San Rafael Swell and Muddy Creek. Please protect these wilderness areas from oil and gas development and please designate specific trails from ORV use. Your state is too beautiful to let roads and drilling spoil its amazing beauty now and for future generations.	Please see general comment responses #36 and #101
Lori	Mishawka	Process and Procedures	I lived in Moab, Utah for a time. I moved there for one reason, the beauty and majesty of the red rock desert. There is no place like it on Earth. Why do you think the Europeans flock there year after year? Please consider the alternative to this useless destruction of the desert and adopt the Castle Country Heritage Plan.	Please see general comment response #35
James	Mohr	OHV Route Identification	I urge that strong, specific and rapid action be taken to regulate the use of off road vehicles on public lands. Making it clear that lands are closed to ORV use unless or until they are clearly posted as being open, and following through with strict enforcement, is, in my view essential to preventing irreparable damage to vast areas of land that belong to all the citizens of the nation, and are in your stewardship. Where ORV trails are allowed, they should be clearly marked, and their proper use strongly enforced.	Please see general comment responses #15 and #19
Amie	Mollack	Recreation	I strongly oppose the current proposition to ban motors or limit motor use in the canyons of Desolation and Gray. Most commercial clients are apprehensive about spending more than 4 or 5 days on the water - motors give these people with limited time the vacation they are expecting. The use of motors increases their experience of what rivers and canyons can offer. Motors help to provide myself with the ability to educate and show our clients what these canyons have to offer. During emergency motors are crucial to our clients to ensure their safety if injury has occurred. Motors provide the ability to move through undesirable areas and give my friends and family	Please see general comment response #34

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			member's trips without complication due to insects, weather, etc...	
James	Moore	Transportation and Access	This letter is to convey my concerns about closing any backcountry airstrips. I don't believe any new airstrips are being created so the closure of any precludes the use of airstrips forever.	Please see general comment response #21
Jeff	Morse	Cultural Resources	I have just spent a couple of days in and around Nine Mile Canyon which I understand you are responsible for an upcoming management plan. As a student of the Fremont and Anasazi cultures, I found the canyon to be an unprecedented resource of Fremont culture, particularly the petroglyphs which are abundant. I'm amazed that brand new industrial activity such as the plant at Dry Canyon is being permitted. This should not be happening. I saw that some of the petroglyphs are being covered with dust from the large trucks that now travel the road due to this industrial activity. Please protect Nine Mile Canyon as an archeological resource. There are alternative sites and routes of travel for these industrial activities.	The Draft RMP/DEIS reviewed a range of corridor alternatives for energy transportation in Nine Mile Canyon (see maps 2-51, 2-52 and 2-53). Access in the bottom of Nine Mile Canyon is a county controlled right of way and is not subject to BLM management.
Rich	Moser	OHV Route Identification	I am fine with limited industrial use and motorized vehicle areas, but they must be highly limited. I view the rapid growth of off-road vehicle use to be the primary problem that BLM needs to address today. Let's create a very few areas for these people to recreate, and close--and enforce closure of-- the rest of the areas.	Please see general comment responses #15 and #19
Anne	Moss	Minerals and Energy Resources	We have been given so many beautiful and totally unique landscapes to enjoy here in this country. I marvel and thrill with the panorama of each wilderness area we explore. It concerns me that too many of our people in government seem to see the short-term solutions to our land management. Specifically - Nine Mile Canyon! It would be a crime and total tragedy to drill for natural gas there. Why ruin something that has taken thousands of years to create just to gain a little gas? Surely, there are other ways to gain these resources without destroying these precious natural lands we all enjoy.	Please see general comment responses #9 and #18
David	Moss	Recreation	We as a family enjoy countless weekends Camping and Horse back riding all over the proposed area. I would hate to lose that quality time that I have been able to spend with my family and friends. I cant see having to get permission and give detailed plans in order to acquire a permit 6 months in advance as has been proposed. I understand that yes motor travel should be restricted in some areas but not to the extent that has been proposed. It is getting very hard to find places to hunt. fish, camp and do things with ones family because you are always restricted by a sign that reads "PRIVATE PROPERTY NO TRESSPASSING" and now you want to close another 2-3 million acres of BLM PUBLIC LANDS at this rate the only place left to camp will be your local KOA camp ground.	Please see general comment response #81
Robert	Moss	Minerals and Energy Resources	I strongly urge that none of the plans should allow the granting of oil and gas leases in proposed wilderness areas. Making oil and gas development a priority activity would violate BLM's "multiple use" mandate. Such development should be allowed in limited circumstances where it will not destroy irreplaceable values.	Please see general comment responses #1, #18 and #19
Robert	Moss	OHV Route Identification	It is gratifying that BLM has decided to complete travel plans in conjunction with each of the RMP revisions. These travel plans should severely restrict motorized travel, which, as the most destructive form of "recreation", can be given a lower priority than non-motorized travel without violating the "multiple use" mandate. If any motorized use is allowed, the travel plans should: - Include an effective trail enforcement plan. -Designate and clearly sign motorized routes, but only where conflicts with other resource values do not exist. -Implement effective and frequent monitoring of ORV impacts; set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs; and plan and budget for adequate enforcement of travel plans. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, the BLM should not allow ORV use. -Restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for	Please see general comment responses #12, #15 and #19

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			wilderness designation under America's Redrock Wilderness Act. -Preclude ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems. -Evaluate ORV impacts on all resources and uses in the planning area. -Completely prohibit all cross-country motorized travel.	
Leon	Motte	Minerals and Energy Resources	As an individual who lives and works in the region, I am concerned with the tendency the BLM has to sympathize with the radical environmental movements. Under federal environmental regulation the BLM is required to consider how they affect human livelihood when they make their decisions. The socioeconomic study is an example of the agency whitewashing the socioeconomics and shifting most of the remaining focus to "resource protection."	Please see general comment responses #18 and #132
Julie	Mountain	Minerals and Energy Resources	I am writing you to express my deep concerns over aggressive plans to open important lands in Utah and throughout the west for oil and gas exploration. I understand our nation's insatiable need to use resources, but opening wild lands that should be regarded as part of our national heritage and protected due to their important ecological significance for the development of oil and gas to provide this nation with a few days or weeks of oil and gas is NOT the answer. With global warming concerns and the rapid development of open space with little regard for future generations seems entirely foolish. I am surprised that we continue to disregard conservation and the development of alternative fuels. And the thought of ruining more land and natural beauty disgusts me. Can't we learn to take pride in protecting something instead of raping it for short term gains?	Please see general comment response #18
Al	Mowbray	Lands and Realty	PEOPLE should be free to use land however they want, for their personal use, and for that I am not in favor of limiting personal use of public lands. What I do oppose is CORPORATIONS taking those lands away from people, and using them to further destroy this planet, delaying the inevitable collapse of the fossil fuel economy, in order to make a profit.	The Bureau of Land Management administers public lands within a framework of numerous laws. The most comprehensive of these is the Federal Land Policy and Management Act of 1976 (FLPMA). All Bureau policies, procedures and management actions must be consistent with FLPMA and the other laws that govern use of the public lands. It is outside the scope of this RMP to address management alternatives that would require changes to national legislation .
Al	Mowbray	Minerals and Energy Resources	I'm an environmentalist. I believe that opening up wilderness areas for mining of natural resources is wrong. The resources we gain from that mining is not sustainable, especially in the cases of natural gas and other fossil fuels. We should be putting more resources into developing alternative energy sources. I am willing to pay for higher gas prices temporarily, as it is phased out of use. If the price goes up, that will increase demand for alternative power sources. The general public has always supported environmentally friendly products in theory but in practice they buy SUVs and demand low gas prices. I believe that alternative power sources have the potential to effectively replace fossil fuels, but they will not do so until they have the backing of the government, which is obviously now holding the stance of pro-fossil fuel. The damage to the lands which are drilled is unnecessary, and only prolongs the inevitable collapse of the fossil fuel industry, at the expense of the environment. The mountains won't tumble to the sea, and the gorges will not collapse, but the slow, steadily increasing pollution	Please see general comment response #18

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			that fossil fuel use and mining creates is detrimental to the entire planet, not just to those particular wildlife areas. The use of these lands by ATVs or SUVs or people in motorized boats is trivial, if gas was more expensive, they would stay home or go hiking or sailing.	
Reinhard	Mueller	Recreation	as a current hiker, camper, kayaker, rock climber, trail motorcycle rider, I have seen, hiked, camped and ridden almost every corner of Utah. But now, I am becoming fearful that the opportunities that have made my life so enjoyable will soon be severly restricted if the overzealous environmental lobby has it's way... After the wilderness study restrictions went into effect, they effectively eliminated our being able to enjoy that part of the Swell because of our time and energy limitations... I am against existing road and trail closures of almost every kind... I am against camping restrictions to designated camping spots...I am against micromanagement of several government agencies for the Swell.	Please see general comment response #81
John	Mullarkey	OHV Route Identification	I have been hearing from various sources alarming information about closures and restrictions in the Chimney Rock and Summerville Trail system also the Arappeen trail connector routes. It is wrong for the BLM to ignore accurate and valid route inventories that were submitted by the OHV community. Please keep these beautiful trails open so that my family can continue to recreate and spend vacations in one of the most incredible parts of Utah.	Please see general comment response #19
Brian	Murdock	Fire and Fuels Management	Under the No Action Alternative motorized suppression in areas closed to ORV use is discussed. This is a good idea. Often times the suppression efforts have more of an impact on the landscape than the actual fire. In areas closed to OHVs, motorized suppression should only occur to prevent loss of human life, or property. This alternative should at least be considered when the FMPs are updated.	While motorized suppression is not limited in areas closed to ORV use, the action alternatives allow the Fire Management Plan to consider such restrictions as appropriate. BLM currently minimizes off-road travel with fire vehicles. Most of the areas where the Price Field Office implements fire suppression are not suitable to off-road travel (steep terrain, cliffs, etc.) As such, off-road travel is quite rare.
Brian	Murdock	Livestock Grazing	Precluding livestock in the Green River, Rock Creek, Price River South, San Rafael River, Saucer Basin, and Horseshoe North Allotments within the SRMAs as outlined in Alt C, is imperative to protecting the fragile riparian areas and unique wildland recreational experiences found in those areas. Identification of administrative access routes to range improvements is a good idea; however, any new range developments constructed in a WSA should include as a stipulations that if the WSA is designated as wilderness, access may be restricted to non-motorized means. I support allocating existing AUMs in the listed Allotments to watershed benefit.	In accordance with BLM Handbook 8550-1, range improvements constructed in WSAs must meet the criteria of non-impairment of the wilderness characteristics. A project, once constructed could be grandfathered for continued future use. Therefore, some projects may be authorized to be maintained with motorized equipment.
Brian	Murdock	Minerals and Energy Resources	I would propose to add a decision that would not allow any leasing within a 1/4 mile of the existing WSA boundaries. Nevada has adopted this as a statewide policy on BLM in the state to prevent any leases inadvertently being placed within the WSAs. To provide a full range of alternatives there needs to be an alternative that would close all lands known to have wilderness character to fluid mineral leasing. The preferred alternative currently allows many of these areas to be leased with minimal if any constraints. At a minimum, there should be an alternative that places major constraints on any leasing in sensitive areas such as ACECs, SRMAs, and lands found to have wilderness character... Lands with wilderness character should also be included in the withdrawal...	Please see general comment response #101
Brian	Murdock	Minerals and Energy Resources	Because oil and gas leasing is a discretionary action the RMP must contain an alternative that closes the Nine Mile Canyon SRMA (as well as other areas found to contain wilderness character) to all leasing. The Draft RMP does not contain a full range of viable alternatives without alternatives that close these areas to leasing. An	Please see general comment responses #2, #18, #36 and #131

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			alternative withdrawing Muddy Creek, Segers Hole, Sid's Mountain, Temple-Cottonwood-Dugout Wash, Uranium Mining Districts ACECs from mineral entry needs to be analyzed. The "Locatable Minerals" section contains alternatives that would withdraw the ACECs mentioned above from mineral entry, so it would seem that not including an alternative withdrawing them from mineral entry would be inconsistent with the alternatives in the Minerals section. An alternative closing the Muddy Creek, Rock Art, Segers Hole, Sid's Mountain, Lower Green River, Temple-Cottonwood-Dugout Wash, Nine Mile Canyon, Heritage Sites, Uranium Mining Districts ACECs to oil and gas leasing needs to be analyzed.	
Brian	Murdock	OHV Route Identification	I generally support the route designations in Alt C and believe that this is the most balanced approach. However the scale of the maps makes it difficult to determine the location of many of the routes. The other Alternatives show several routes being open that are not even passable to vehicles. These routes should not be opened to vehicles regardless of which Alternative is chosen... I support excluding WSAs and ACECs from utility corridors as outlined in Alt C.	Please see general comment responses #19, #31 and #32
Brian	Murdock	OHV Route Identification	I support requiring that all game retrieval adhere to the OHV designations... While I am committed to keeping wildlands as roadless as possible, I do support the establishment of small open areas near local communities, if they so desire. These open areas should provide recreational opportunities for the OHV users while hopefully reducing the illegal creation of play areas in more remove and wild places in the Price Field Office.	Under the Proposed RMP, cross country OHV travel would not be allowed, unless small areas adjacent to or near incorporated towns in previously disturbed areas were designated through subsequent NEPA analysis.
Brian	Murdock	OHV Route Identification	I was encouraged to see that BLM is dedicated to not only designating OHV classes but also actual routes in the RMP... I understand that the route designations for the San Rafael were already made in the San Rafael Travel Plan; however, it appears that certain routes left open in that plan (i.e. the Devils Race Track, Coal Wash) would fall into a closed area in the Alt C map? I also noticed that in the Alt C OHV designations (presumably the most restrictive) that the area around Spring and Nates Canyon north of Mexican Mountain was left in the 'Open to Designated Route' category. This area should be included in the 'Closed Areas" Category. Aside from the OHV tracks on top of the plateau this area is essentially roadless... -Trail Canyon Route is shown traveling north from the Price River Gorge area over the top of the plateau and down into Turtle Canyon. I have taken packhorses over this route several times and it took several different trips just to find a way to get horses over, vehicles would not be able to drive the route shown on the Route Designation map. This route should not be opened to vehicles. -Big Horn Benches/Rabbit Valley- the route that crosses the top of the Big Horn Benches and then drops into Rabbit Valley and then north along the Green River should be closed. Keeping it open will impact the unique primitive whitewater float trip experience through Desolation Canyon. -Three Fords Canyon Route- The route that leaves Range Creek and heads east to Three Fords Canyon and then north along the Green River should also be closed. Keeping it open will impact the unique primitive whitewater float trip experience through Desolation Canyon. -Price River Gorge- A route is shown traveling down the Price River Gorge. I have floated this section of river several items and while there is a passable route near the head of the Gorge, there is no rote through the majority of the Gorge. This area provides unique river trip opportunities and excellent bighorn habitat and should not be left open to OHV use. The route south of the Price River along the west side of the Green River should also be closed for the same reasons. Beckwith Plateau Route- The route to the drill hole on top of the Beckwith should be closed. The Beckwith is critical bighorn habitat and the last time I was on the road (on horseback) it did not seem as if the route receives much use.	Please see general comment response #20
Brian	Murdock	Recreation	Emphasizing Leave No Trace Principles will help mitigate recreational impacts in the PFO. An alternative requiring that all SRPs will be required to follow the Leave No Trace Principles should be included in the RMP... The Range Creek jeep trail should be closed at the confluence with Turtle Canyon. The area offers outstanding	Please see general comment response #92

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			opportunities for solitude, allowing the bottom end of Range Creek to remain free form the impacts and sounds of OHVs will protect this amazing area. The maps for route designations for Alt C and D both show the Range Creek route ending at the confluence, but the Alternative D narrative describes the route being open to the lower drill hole, the map should reflect the narrative... As a visitor to the area who uses horses I support allowing pack stock use throughout the area and allowing ground fires; however, I also understand that both of these uses can have a tremendous impact to resources if care is not taken. In areas where these uses are having a significant impact on the resources limits should be placed on the activities. The "Leave No Trace" principles should be used in all outreach materials and users should be required to follow them. Campfires associated with vehicle camping areas should be required to use an existing fire ring or use a fire pan. The designation of Mexican Mountain and Sid's Mountain as high use areas does not make sense, both of these areas are much more remote than those listed above and from my experience receive much less use. The top of Sid's Mountain should not be put into the same management category as the area around the San Rafael Bridge. An alternative that would mitigate the impacts of high recreational use by restricting motorized access to Sids Mountain and Mexican Mountain (i.e. closing routes) needs to be included...	
Brian	Murdock	Transportation and Access	I would recommend the closure of the Mexican Mountain and Hidden Splendor backcountry airstrips. Neither of these strips are essential for access, they are simply used recreationally. I have begun to see increased use of the Mexican Mountain strip, these low flying aircraft impact the primitive recreational experience found in these areas.	Please see general comment response #21
Brian	Murdock	Visual Resources	There needs to be an alternative designating all lands with wilderness character as Class I... There also needs to be an alternative that designates the Nine Mile SRMA (as well as other areas found to contain wilderness character) as class I VRM.	Please see general comment responses #36 and #140
Brian	Murdock	Wild and Scenic Rivers	The unique recreational opportunities associates with Fish Creek from the Scofield Dam to Highway 6 should be one of the values that qualify it ORF eligibility.	Please see general comment response #27
Brian	Murdock	Wild and Scenic Rivers	Under Alt D the Nine Mile Creek to Chandler Canyon and the Florence Creek to Nefertiti segments of Desolation Canyon are recommended suitable as a 'scenic' designation. These designations do not make sense, these sections are roadless and undeveloped and due to the fact that the river also runs through a WSA, most future developments would also be precluded. The BLM eligibility study for the RMP found these sections to meet the 'wild' criteria; the suitability recommendation should be consistent with these findings. Both segments should be recommended suitable with a tentative classification of 'wild' as outlined in Alt C.	Please see general comment response #148
Brian	Murdock	Wild and Scenic Rivers	Muddy Creek from I-70 all the way through the Swell provides a unique opportunity to kayak through a slot canyon in a completely wild setting. The entire stretch of Muddy Creek (I-70 to Country Road) should be recommended as suitable with a tentative classification as 'wild'.	Please see general comment response #27
Brian	Murdock	Wild and Scenic Rivers	The Price River Gorge from Woodside to the confluence with the Green provides outstanding kayaking/canoeing opportunities through a desert gorge. The river should be recommended as suitable with a tentative classification as outlined in Alt C.	Please see general comment response #27
Brian	Murdock	Wild and Scenic Rivers	Both Black Boxes and the Lower Black Box provide outstanding opportunities for Kayaking through a wild slot canyon as well as relatively easy canyoneering at lower water levels.	Please see general comment response #27
Brian	Murdock	Wild and Scenic Rivers	The BLM eligibility study for the RMP found the Fuller Bottom to Johansen Corral, and the Lockhart Wash to Tidwell Bottom sections to meet the 'wild' criteria, the suitability recommendation should be consistent with these findings. Both segments should be recommended suitable with a tentative classification of 'wild' as outlined in Alt	Since a river's classification provides a framework for the management prescriptions applied within the river area, some flexibility, though limited, is necessary to consider a range of alternative

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			C.	tentative classifications. BLM's Wild and Scenic River Manual (Section 8351.33C.) states, "Additional alternatives may be formulated for any combination of designations and/or classifications. Whenever an eligible river segment has been tentatively classified, e.g. as a wild river area, other appropriate alternatives may provide for designation at another classification level (scenic or recreational)." Reasons for considering alternative tentative classifications include to resolve conflicts with other management objectives (whether BLM's or those of another official entity), continuity of management prescriptions, or other management considerations.
Brian	Murdock	Wild Horses and Burros	I fully support setting the Robbers Roost AML at O. Other HMAs should also be considered for setting AMLs of O.	Each Herd Area was reviewed for ability to support a self-sustaining viable population of wild horses or burros utilizing minimum feasible management, as directed by the Wild Free-Roaming Horses and Burros Act. Habitat in the Robbers Roost Herd Area was found to be unsuitable at this time for such a population without implementing extensive management actions. The remaining Herd Areas were found to be capable of supporting self-sustaining populations utilizing minimum management. As such, setting an AML of 0 for other HMAs would be contrary to the Wild and Free-Roaming Horse and Burro Act.
Brian	Murdock	Wild Horses and Burros	Alternative B discusses removing horses before introducing burros into the HMAs? I do not understand why BLM would be introducing burros anywhere. Burros are non-native and compete with native wildlife.	Wild burros were present in the San Rafael Swell in 1971 when the Wild Free-Roaming Horse and Burro Act was passed. As such, those wild burros and their descendants fall under the protections outlined in that Act (43 CFR 4700.0-5(l). Wild burro habitat has been compromised significantly on a national basis since the passage of the Act. This has been due to threatened and endangered species conflicts and the transfer of public land ownership (i.e.: California Desert Protection Act, etc.). Areas of habitat that are compatible to wild burros are being reviewed to ensure "self-sustaining populations of healthy animals in balance with other uses and the productive capacity of their habitat" (43 CFR 4700.0-6(a). Habitat within the San Rafael Swell has been

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				proven by the Sinbad burros to be very suitable to their subsistence. Due to the small management number or capacity of wild horses in the region, wild burros may be more suitable to the terrain and topography of the Swell. Wild burros have a different type of social structure, when compared to wild horses, which allows maximum breeding efficiency. The Wild Free-Roaming Horses and Burros Act of 1971 (Public Law 92-195) states that wild horses and burros are “an integral part of the natural system of the public lands.” Alternative B proposes allowing the existing wild burro populations to use burro habitat throughout the San Rafael Swell, in both the Sinbad Herd Area and Muddy Creek Herd Area, rather than managing the area for wild horses.
Brian	Murdock	Wilderness	The first thing that I noticed after reading the document was the lack of protection for many of those lands that were reinventoried in the 1990's for wilderness character. I know that the Bureau's ability to designate new WSAs through the planning process was rescinded with the Utah v. Norton settlement, but the settlement also stated that the BLM was committed to protecting wilderness values and that lands outside of WSAs that contained those values could still be managed to protect them. BLM found that many lands outside the existing WSAs contained wilderness character. Cedar Mountain, Hondu Country, Mexican Mountain units, Devils Canyon units, Muddy Creek-Crack Canyon, Mussentuchit Badlands, San Rafael Reef, Sids Mountain, Upper Muddy Creek, and Wildhorse Mesa, Desolation Canyon, Jack Canyon, and Turtle Canyon were all found to contain wilderness characteristics in BLM's Wilderness Inventory of 1999 publication, yet there is no alternative that expressly outlines the protection of those characteristics. It appears that some of the proposed ACECs and OHV designations would provide some level of protection to some of these areas, but no alternative would protect them all from oil and gas leasing, mineral development, new range developments, or other potential impacts to their wild character. I propose that to have a full range of viable alternatives that at least one alternative needs to be developed that would provide these protections for all reinventoried lands found to have wilderness character...	Please see general comment response #141
Brian	Murdock	Wilderness	To protect those areas that were found to have wilderness values in the reinventory there needs to be an alternative that would close all of those areas to motorized vehicles. Alternative C is the alternative that currently would provide the most protection for those areas but I do not think it goes far enough.	Please see general comment response #111
Brian	Murdock	Wilderness	Acquisitions should be managed similar to the most restrictively managed adjacent parcel. This policy should at least apply to future acquisitions that contain wilderness character adjacent to the existing WSAs. Although the Utah v. Norton settlement prohibits future acquisitions from being designated as WSAs, they can and should be managed to protect their wilderness qualities, if they contain them... the IMP already excludes WSAs from new utility corridors, Alternative D should also exclude areas that were found to have wilderness character in the reinventory as well. This would make Alt D less restrictive than Alt C (which would prohibit all new utility corridors, but still protect those areas that have BLM has found to have wilderness character.)...	Please see general comment response #111
Brian	Murdock	Wildlife and Fish	Alternative D discusses supplemental release of game birds and fishes without additional NEPA analysis. If these	Please see general comment response #8. The

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			releases involved non-native wildlife or motorized transport or equipment in a WSA than additional NEPA analysis would be required, therefore this alternative does not seem to be consistent with the IMP.	BLM Wilderness IMP would apply to WSAs under all alternatives. The IMP states that stocking of wildlife and fish species native to North America may be permitted within the former historical range of the species. Where exotics were being stocked before October 21, 1976, the stocking may continue. Introduction of threatened, endangered or other special status species native to North America may be allowed. Such introductions will be limited to the historical range of the species unless introduction is needed to prevent extinction or is essential for recovery. Therefore releases of wildlife under these terms would be compatible with the IMP.
Eliza	Murphy	OHV Route Identification	Off road vehicle users have proven time and time again that they determine where they ride, whether it be on a designated trail or not. This illegal trespassing and the attendant wanton destruction on public lands is reprehensible and as a taxpayer, I do not want to spend money on permitting additional recreation on land that belongs to us all, not the few who are hellbent on destruction. I would prefer my tax dollars go to pay for staff to enforce the laws that exist for protection of precious living soils and the plants and animals at risk of extirpation if this inane form of "fun" persists without policing.	Please see general comment response #19
Leon and Jean	Nardi	Process and Procedures	According to the Natural Resources Defense Council, the Bureau of Land Management has just released a draft land use plan that would open 98 of Redrock Wilderness quality lands to oil and gas drilling. As part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the BLM's Price Field Office and especially the above mentioned 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development and save them for the natural sustenance we and our children desperately need from such pristine environments. On behalf of future generation, I ask that you replace your draft plan with a balanced plan that provides for a full range or values and uses, including wilderness.	Please see general comment response #36 and #101
Mark and Stephanie	Natt	Minerals and Energy Resources	You must protect all habitats within the "America's Redrock Wilderness Act" from oil/gas drilling	Please see general comment response #101
Mark and Stephanie	Natt	OHV Route Identification	We understand that many people enjoy recreating with them and with other off road vehicle, but these activities should be limited to designated areas and be regulated.	Please see general comment response #19
Stephanie and Mark	Natt	Wilderness	These places, especially a treasure like Nine Mile Canyon, deserve protection, not exploitation. It is disturbing to think that these areas, including 98 of wilderness will be left open for oil/gas exploration and possible unlimited, unmonitored ATV/OHV use. Please adopt the Castle Country Heritage Plan - the alternative that will offer real solutions.	Please see general comment response #109
Robert	Neithart	OHV Route Identification	The OHV community has made a strong effort to comply with BLM procedures in inventorying all existing OHV routes for land planning purposes. This process has been made even more difficult because the BLM does not seem to be using this information in a transparent manner. And the BLM apparent disregard of OHV route information already provided does not reflect a desire to cooperate or work in good faith with the responsible OHV	The Proposed RMP would not designate all existing routes as open for use. The route designation process was started from a baseline of known existing routes. BLM, with assistance of its

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			community. Please correct this error and incorporate all route information provided by the OHV community into your ongoing planning and inventory process.	cooperators (including Carbon and Emery Counties) has evaluated existing routes, considering resource impacts, safety considerations, landscape settings and recreational opportunities. The routes that would best serve the motorized recreating public were identified on the basis of potential conflicts with other resources and use including conflicts between motorized and non-motorized uses. Under the Proposed RMP redundant routes (multiple routes going to the same place) or routes that appear to serve no purpose would be closed to OHV use. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Also see general comment response #31.
Andrew	Nelson	Minerals and Energy Resources	As a student of engineering, I am somewhat familiar with the practices of oil prospecting, and the intense shock waves generated by explosives that are required to see the contents of the underground. It seems that we have forgotten our role as stewards and are considering oil and gas prospecting, as well as drilling, on lands within the Wilderness act. 100 years from now, when these oil fields have long been depleted, what legacy will be more important, the short term benefits of oil and the select few that became wealthy from its extraction, or the environmental destruction, not to mention the loss of recreational opportunities, suffered by the citizens of Utah? Please be responsible with this extremely important decision, more of use care than one would think.	Please see general comment response #18
Belinda	Nelson	Transportation and Access	Someone passed on this address to drop a note saying how the back country strips affect us. We have enjoyed so much being able to use Mineral Canyon, Mexican Mountain and others... We appreciate and respect loving the ability to enjoy our lands known to all as America.	Please see general comment response #21
Bonnie	Nelson	OHV Route Identification	I strongly oppose the stand you are taking in designating every invented trail for use. This is not realistic nor protective of our vast and beautiful wilderness area. You are not protecting sensitive areas and it seems more and more like motorized vehicles are running our state. I taught my hundreds of students over 26 years teaching to love, respect, and protect our land heritage. Please don't destroy that.	Please see general comment response #19
Dan	Nelson	Transportation and Access	I noticed in your resource management plan that you specifically mention a few of the airports I have visited over the years, namely those listed in bold (Mexican Mountain, Hidden Splendor, Cedar Mountain, and Sagebrush Flat. I would hate to see these air strips be eliminated as sites where I can land with my family and enjoy their beauty and remoteness. Please record my comment in support of your preferred alternative D for the study.	Please see general comment response #21
Emily	Nelson	Minerals and Energy Resources	Although I understand the need for oil and natural gas, I feel that we have not yet tapped into our current resources. I strongly urge you to protect the beautiful areas of Central Utah from oil and gas wells.	Please see general comment response #18
Joy	Nelson	Minerals and Energy Resources	If the following statement is true then it truly is a disgraceful act on behalf of our government:	Please see general comment response #101

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			'The Bureau of Land Management (BLM) plans to sacrifice 98% of wilderness-quality land in some of the most beautiful high deserts in central Utah to oil and gas drilling and development. The U.S. Geological Survey estimates that oil and gas deposits under America's Redrock Wilderness would amount to a mere 4 days worth of oil and less than 4 weeks worth of natural gas.'	
Otis and Lynne	Newbold	Minerals and Energy Resources	We feel it is a serious mistake for the intrusion of gas and oil companies to develop on these sites.	Please see general comment response #18, #36 and #101
Scott	Newman	Transportation and Access	I wish to convey my support for your staff including "continued use" of certain airports in your "support/transportation" portion of the new RMP. expand your safeguards to future casual visitation to all airstrips on your lands.	Please see general comment response #21
Joe	Newton	Wilderness	I am writing to urge you to reconsider your plan for the 2.5 million acres managed by the BLM's Price Field Office -- specifically the Redrock Wilderness. As always, let's put the future enjoyment of these lands in safe trust for our children, and not exploit them for the selfish and temporary gains of a few.	Please see general comment response #111
Gary	Nichols	OHV Route Identification	There is plenty of access without opening up Wilderness Study Areas to desecration by ATV users. There are plenty of existing ATV routes. ATV's are ruining these areas and should be limited to existing roads. They destroy the solitude, tear up the cryptobiotic crust and other plant life, cause severe erosion problems, scare animals, and many of those using them leave their trash and damage historic and prehistoric sites.	Please see general comment response #19
Gary	Nichols	Soil, Water and Riparian	I would especially urge protection of all riparian areas as they are life to all living creatures	Please see general comment response #67
Larry and Kristen	Nilssen	OHV Route Identification	We have noted the destruction of off road motorized recreation. It seems that a small number will not stay "on trail" and cause destruction all out of proportion to their numbers.	Please see general comment response #19
Lawrence	Nilssen	Wilderness	We would urge you to preserve the areas within the Red Rock Wilderness Act and to designate no areas as "open areas", and to increase enforcement of all rules.	Please see general comment responses #15 and #36
John and Laura	Ninnemann	Process and Procedures	We support the Castle Country Heritage Plan, which is a citizen's alternative that offers balanced development and protection. We urge you to continue to protect those areas within the America's Redrock Wilderness Act and not bow to special interests that would destroy what should be kept for our grandchildren to enjoy. Thank you for your careful consideration of comments such as these in your management plan. We are counting on you to maintain a reasonable balance that serves both protectionists and recreationists alike.	Please see general comment responses #35 and #36
John and Laura	Ninnemann	Wilderness	I cannot believe that unique treasures such as Nine Mile Canyon and Desolation Canyon are on the hit list for road development, drilling, all the inherent traffic and pollution, and the habitat destruction that would be created. There are plenty of other areas that could and probably should be developed without destroying the wilderness quality lands and very special archaeological areas that are left.	Please see general comment response #36 and #101
Ruxton	Noble	Alternative Maps	I am disappointed to learn that the Price BLM has left out many important routes in their inventory. I am very disturbed to learn that the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes do not appear on any of the Maps in the Appendix.	Please see general comment responses #20 and #31
Ruxton	Noble	OHV Route Identification	Public input is a critical component of BLM□s lawful planning process. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. It appears that the OHV community's input is frequently ignored by the BLM which is unacceptable tome. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's	Please see general comment responses #19, #20, #31, #143 and #145

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			preferred alternative.	
Ruxton	Noble	Transportation and Access	Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	Please see general comment response #10
None	None	Recreation	My stand is to leave things as they are when you start talking about limiting the number of people that can camp together.	Please see general comment response #81
Amber	None Provided	Transportation and Access	I would really like to see the trails open. We as a family use these on a regular basis.	Please see general comment response #10
Darreld	None Provided	OHV Route Identification	We need to keep all of it open to ATV's. This land belongs to everyone and it should be left open to multiple use.	Please see general comment response #19
DE	None Provided	OHV Route Identification	I am disabled and cannot walk far - I should be able to get access to the things I love. Let's manage [our lands] and save [them] but with accessibility to everyone. No one should have the gates closed on them forever. Some of us cannot walk and need to ride. We respect the land and are careful. People can be taught to respect wilderness.	Please see general comment response #80
Diane	None Provided	Process and Procedures	I support the Castle County Heritage Plan. I urge you to protect our wilderness from off-road vehicles and oil and gas development, including leasing and drilling. Thank you for listening. Diane	Please see general comment responses #35 and #36
Georg	None Provided	Minerals and Energy Resources	The first mistake is that the draft plan is badly out of balance. It is tilted heavily toward oil and gas drilling.	Please see general comment response #18
Georg	None Provided	OHV Route Identification	The first mistake is that the draft plan is badly out of balance. It is tilted heavily toward letting dirt bikes and jeeps continue destroying wilderness values. The plan should be revised to prohibit off-road vehicles within the proposed wilderness areas in the Redrock Act.	Please see general comment responses #12 and #36
Georg	None Provided	Wilderness	The second mistake is that wilderness was not considered, thanks to a policy adopted by Interior Secretary Gale Norton. We urge BLM to protect the areas Congress is considering for permanent wilderness protection under "America's Redrock Wilderness Act."	Please see general comment response #36
George	None Provided	OHV Route Identification	Please intervene in the planning effort for the Price district to correct provisions that designate all the existing trails as being open to motor vehicles. That would be a terrible imbalance in the plan. BLM should be taking steps to manage those unauthorized ORV routes.	Please see general comment response #19
George	None Provided	OHV Route Identification	BLM should be closing the unauthorized ORV tracks in the proposed wilderness areas and getting revegetation started. We would favor the "citizens' RMP proposal" for Price that outlines areas to be put off-limits to motorized travel.	Please see general comment responses #12, #35 and #36
George	None Provided	Wilderness	We also urge extreme caution in allowing impacts to accrue in the areas proposed for wilderness in America's Redrock Wilderness Act.	Please see general comment response #36
Jerry	None Provided	Transportation and Access	I have been very concerned with information stating that plans are being discussed to reduce Public Access to the San Rafael Range. According to studies conducted in the SRRDP, OHV, current levels of use, cause no significant negative impact to the Area.	Please see general comment response #10
Jim and Mary	None Provided	Transportation and Access	Being able to access the backcountry by air makes it possible to visit for short trips, even though we live several hundred miles away. If we had to travel by car, we'd be limited to only a single trip a year and we'd visit far fewer destinations once we got there. We often base ourselves out of Moab and a trip by car to a place like Angel Point	Please see general comment response #21

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			would take a full day of driving just one-way. By air, we can be there in less than an hour and enjoy a full day of hiking and rock climbing. We also feel that air travel has a very low impact on the environment, because we only need a few thousand feet of dirt road to land on. If we travel by car from Moab to Angel Point, it takes at least 50 miles or more of road to get there, which represents a much greater impact on the environment and we'd burn a lot more gasoline in the process. We greatly appreciate your work in making the backcountry accessible to us by air. Keeping backcountry airstrips open will allow us and many other "flying families" to enjoy your state. Keep us the great work!	
John	None Provided	Minerals and Energy Resources	Exploiting wilderness lands for oil exploration and development might solve an immediate problem, but in the long run will be an ecological nightmare - and cause irreparable harm to the environment. There are other energy sources that can be developed without ruining our states beauty and special attractions. Please stop the oil exploration and drilling!	Please see general comment response #101
Josef	None Provided	OHV Route Identification	We were under the impression that a better strategy to manage off-road vehicles was under consideration. This does not seem to be reflected in the myriad roads now leading well into all Wilderness Study Areas. I have been amazed at the destruction caused by these vehicles, and the number of unauthorized "roads" which have been carved throughout the wilderness. Some of these cut through the soil, others through cultural sites, riparian corridors and lands actually within the wilderness study areas. To designate every inventoried trial as a motorized route is not in keeping with the promise the BLM has made to protect these areas... To extend these trails into wilderness areas ignores the citizen's desire for motor-free areas used by backpackers and hikers. More importantly, it ignores the damage caused to delicate ecosystems which can never be replaced.	Please see general comment responses #12, #19, and #36
Josef	None Provided	OHV Route Identification	We urge you to complete a comprehensive route designation plan within the Price Field Office that considers non-motorized users of public land and protects sensitive areas that will be ruined by continued ORV use.	Please see general comment responses #15 and #19
LeeAnn	None Provided	Minerals and Energy Resources	Our family enjoys hiking and camping and also river running in the Southern Utah Wilderness. Recently I heard on the news some more Ancient Indian Art was vandalized! This is appalling - also that Utah has less than many states of protected BLM land is shameful. When you visit some of these areas (except for the National Parks) - ORV's and their garbage is everywhere. The San Rafael Swell, Desolation Canyon, and Nine Mile Canyon are beautiful and need to be protected from ORV's and gas and oil development.	Please see general comment responses #12, #18, #36,and #101
LeeAnn	None Provided	Wilderness	Our family enjoys hiking and camping and also river running in the Southern Utah Wilderness. Recently I heard on the news some more Ancient Indian Art was vandalized! This is appalling - also that Utah has less than many states of protected BLM land is shameful. When you visit some of these areas (except for the National Parks) - ORV's and their garbage is everywhere. The San Rafael Swell, Desolation Canyon, and Nine Mile Canyon are beautiful and need to be protected from ORV's and gas and oil development.	Please see general comment responses #36 and #109
Matthew	None Provided	Minerals and Energy Resources	We are writing you as concerned citizens of the State of Utah. We have resided in Utah for over 12 years. We have been extremely fortunate to have had opportunities do experience first-hand the wonderful natural treasures of this state. We understand the current presidential administration is supporting exploration of natural resources including gas and oil. We also understand many rural communities in the area of interest, feel that such exploration may provide significant economic benefits to them. We are not opposed to the exploration and	Please see general comment responses #9, #18, #36 and #101

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			extraction of gas and oil; however, we must do this in an intelligent, well-thought-out manner, that minimizes or eliminates any negative impact on the natural treasures of this state. There have been significant technologic advances in oil/gas drilling, including new techniques in horizontal drilling, that would allow access to the subterranean areas of interest, specifically the San Rafael Swell, Desolation Canyon, Nine Mile Canyon and Muddy Creek areas, at a distance, without impacting the surface appearance (ecology and archeology) of these areas. The actual drilling sites could be stationed near existing roads outside the wilderness areas. The application of these new technologies may be a bit more expensive than standard straight-down drilling techniques, but the benefits will be long-lived and much appreciated by future generations. Additionally, the use of high-explosives as part of gathering seismic data, in areas containing significant archeological treasures, should be considered carefully; data, in areas containing significant archeological treasures, should be considered carefully; the potential damaged induced from multiple explosive events over a broad region, may leave one or more of these archeological treasures nonrestorable. Your plan should include a commitment from the developers to cover the expenses of an initial assessment/inventory of archeological sites, and restoration, if needed, following seismic testing. Please consider these perspectives as you develop your plan, and consider the children and grandchildren that will inherit the consequences of our plan.	
Mike	None Provided	Wilderness	We have heard that the BLM will be revamping its RMP soon, and we wanted to go on record as saying that we have applauded many of the decisions which the BLM has made in the past which have kept oil and gas speculators from desolating some of our precious wilderness areas in Utah, and we hope that, in this tradition, you will continue to protect such areas.	Please see general comment responses #36 #109
Olaf	None Provided	OHV Route Identification	Designating every track in the sand leading into a wilderness area makes a mockery of the process. Many such tracks are simply old cow paths, game trails, illegal ORV excursions or long abandoned mining tracks. Such uncritical designation is unacceptable. You must act to protect cultural sites, riparian corridors, wilderness study areas and fragile desert soils lying within America's Redrock wilderness. BLM's proposed plan provides NO balance between motorized and non-motorized recreation area. You need to leave more land farther from designated routes.	Please see general comment responses #19 and #36
Rich	None Provided	OHV Route Identification	We're very concerned that ORV's be prohibited from making new roads into roadless wilderness study areas such as Canaan Mt. We want wilds to remain quiet, unspoiled natural ecosystems for wildlife habitat, the protection of cultural sites and for the enjoyment of the non-motorized community of recreational users. There are plenty of existing motorized trails for ORV riders outside of our roadless wilderness areas identified by the BLM and the Citizens Inventory. Do not designate every inventorial trail as a motorized route. The machines are destructive of wilderness characteristics and must be limited to a minor percentage of our nation's public lands. Please accept the Citizens' RMP Proposal intended to keep wilderness areas wild and free of motorized vehicles.	Please see general comment response #12, #19 and #36
RPS	None Provided	Minerals and Energy Resources	It is (worse than) ridiculous to destroy this magnificent area for what the USGS has estimated to be less than a week's worth of oil. In fact it should be criminal.	Please see general comment responses #18, #36 and #101
RPS	None Provided	OHV Route Identification	I am writing today to endorse the Castle Country Heritage Plan. It is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes, and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #12, #19, #35 and #36.
Shauna	Norrbom	OHV Route Identification	Please keep the existing roads open for OHV use. Families who ride responsibly need this area to enjoy today, and in the future as well.	Please see general comment response #19

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David	Northcutt	OHV Route Identification	I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment response #19
David	Northcutt	Process and Procedures	Few public lands are more deserving of wilderness protection than the wilderness-quality lands within the Price area. Your proposed plan is totally unbalanced in refusing to provide any meaningful protection for these magnificent and irreplaceable wildlands. On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including wilderness.	Please see general comment responses #1 and #36
Clay	Northrop	Minerals and Energy Resources	The insignificant quantities of oil and gas that are estimated to exist in this area do not warrant leaving virtually all of the land open to drilling. How will we justify to future generations that we destroyed the vast majority of our remaining wilderness in the hopes of finding a few days or weeks worth of oil and gas? As we all know, it is not only the exploration and drilling that are cause for concern - the larger problem is the 'roads' that are created, which inevitably lead to the proliferation of further roads, and further degradation of the remaining undeveloped areas of our country.	Please see general comment response #101
Clay	Northrop	OHV Route Identification	It is critical that ORV use be controlled so that the areas yet unspoiled by their noise and tracks remain so. ORVs, by their nature, have a disproportionate impact on the public lands. No-one within 5 miles of them can fail to be aware of their presence, and so if any land is to be available for quiet enjoyment, use of ORVs must be restricted - and those restrictions must be enforced! Please do not designate any further 'open areas', where ORVs are free to do as much damage as they please. The same proliferation problem that exists with oil/gas roads exists with ORVs. Every track seems to become a de facto 'route', and they seem to spread further into wilderness-quality lands with every passing week. As a partial response to this problem, it's critical that no ORV routes be designated in areas that have been designated as wilderness study areas, or that have been identified as wilderness in the "America's Redrock Wilderness Act " currently before Congress.	Please see general comment responses #12 and #36
Robert	Norton	OHV Route Identification	Analysis within the San Rafael Route Designation Plan says that current OHV use levels cause no significant impact. Yet, the BLM now proposes to severely limit group sizes. Such restrictions are not justified under any of the Alternatives and would be unfair to clubs, large families, and friends. The existing 50 vehicle limit works well and should not be changed... Keep open trail systems such as the Temple Mountain Motorcycle trails (the Dick Brass Trail System), the "Four Routes in Sids" which includes: "Fix It Pass", Eva Conover Road, North and South Coal Washes, plus Devil's Racetrack, Behind the Reef Road/Upper Little Wild Horse Canyon Trail System, Cistern Canyon, Eagle Canyon, Hidden Splendor Mine area, Temple Mountain area, and the routes in the Head of Sinbad and Swasy's Cabin region. Routes in Seger's Hole, Eagle Canyon north of the Interstate Highway, and June Bottom should be reopened... The current mix of management of the region has worked well enough. The BLM partnering with OHV and 4x4 groups in 'Adopt-a-Trail' programs has also been successful and could be expanded... All motorized routes within Primitive and Semi-Primitive Non-Motorized (SPNM) designations are closed in ROS designations... Not all of these routes will remain open for motorized use in the Record of Decision... Routes will not be designated in WSAs and ROS 'Primitive' class... Utah BLM has chosen to go beyond the national policy direction related to OHV decisions in RMPs and not only designate areas as open, closed, or limited, but also completing route designations concurrent with the RMP finalization.	Please see general comment responses #20 and #81
Robert	Norton	Process and Procedures	Proposed implementation of overlapping "layers of management" is confusing and the public will have a very difficult time complying with the complex restrictions, permits, fees, and unrecognizable boundaries. I oppose all 'management layers' as proposed in the DRMP and DEIS. 'Management Layers' include, but are not limited to: -	Please see general comment response #37

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			Designating areas 'open', 'limited' and closed to OHV use -Within 'limited' areas, designating specific routes open to OHV use - Recreational Opportunity Spectrum (ROS) -Designating SRMAs -Designating 'High Use Areas' -Designating ACEC -Designating 'Large Group Areas' (LGA) -Special Recreation Permits (SRP)	
John	Nutting	OHV Route Identification	In addition, any of the alternatives that designate "open areas" for ATV use without restriction even outside the wilderness areas, are a bad idea. It would be a crying shame to see even more land marred by these vehicles. There are already millions of acres of land already torn up by these vehicles where ATV riders wouldn't be damaging anything that isn't already damaged. I believe we should restrict them to these areas, at least for starters.	Please see general comment response #19
John	Nutting	Wilderness	I don't believe any of the alternatives go far enough in protecting the lands included in the proposed America's Red Rocks Wilderness Act. I am in favor of a balanced approach, and I believe that there are plenty of lands outside the proposed wilderness areas for activities such as oil and gas development and off-road vehicle use. In order to keep a balance in place, we need to completely restrict these activities from the proposed wilderness areas.	Please see general comment response #36
Linda	O Brien	Soil, Water and Riparian	Haven't you seen what has happened to the local water streams and creeks in Wyoming and Montana since expanded drilling's been allowed on lease land and public land. Cattle ranches have all but dried up as overflow saline and sulphurous waters have advanced on vegetation and local water sources drying up all around it where the animals have no place to graze or drink. Essentially that's called starvation. Nothing to eat or drink!! Just look at the statistics and read about the ranchers' dilemmas.	Please see general comment response #76
Maxine	O Connell	OHV Route Identification	I know by seeing it myself, the terrible damage caused by motorized off road vehicles. I mean to say that this type of use of these lands is very destructive and it happens very quickly and in no time large tracts of land are engulfed by this destruction. I implore you to do more studies, reach a more beneficial balance that will PRESERVE these lands.	Please see general comment responses #12 and #19
Evann	O Donnell	Process and Procedures	Please abandon your draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act.	Please see general comment response #36
Mike	O Steen	OHV Route Identification	I am very concerned about the BLM's apparent intention to ignore the input from the OHV community regarding access to trails and camping in the San Rafael Swell area. I believe the BLM has a responsibility to follow proper procedure when determining what uses will be allowed on our public lands. I am strongly against limiting further the public use of camping and OHV trails in the Chimney Rock and Summerville trail system. Closing these trails will not slow the growth of OHV use in Utah but it WILL increase the impact of OHV use in other parts of the state.	See general comment responses #19, #20 and #31.
Richard	OBrien	OHV Route Identification	OFF ROAD VEHICLES, because of their well documented impact on the landscape, should be very restricted in their access to the price BLM district and proposed wilderness recognized areas. The Price Resource Management Plan appears to be an open invitation for OFF ROAD VEHICLES to use any dirt road, track or cow path for access and inevitable damage to that fragile environment with long-term, negative ecological impact. Please, please respect the environment and protect it for my children to enjoy as I have.	Please see general comment response #19
Allyson	OConnor	Wilderness	I am writing this letter on behalf of Desolation Canyon. As you know, and I recently discovered, this canyon is magnificent in both its beauty, remoteness, and natural resource potential. Every year, thousands of people enjoy the unique ecosystem of the Green River in a way that allows them to escape the din of city life. I am worried that if oil and gas drilling are allowed to take place too close to the canyon rim that experience will be compromised. My river experience within Desolation Canyon was truly one of a kind. It being my first experience living in a	Please see general comment response #22

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			desert I learned to appreciate and respect the extremes that such an environment can offer. Paddling through the canyon, I was truly grateful to be learning in such a pristine place. On my National Outdoor Leadership School trip emphasis was put on learning skills; but more importantly, learning paddling and desert living in a landscape where we can grasp the timelessness of wild areas. I know my experience would not have been as pure had the noise of commercial drilling been in the background. It is very satisfying to wake up to the chirping of birds and the rushing of rapids miles away from the unnatural hum of machines. I understand the need for the utilization of our precious natural resources; however, I strongly believe that some areas must retain the feeling of being untouched by mankind. If desolation Canyon can not remain wilderness on paper, it is my sincere hope that it will be protected from development for moral, if not political, reasons.	
Chris	Olsen	OHV Route Identification	I wanted to send a few comments about the upcoming new travel management plan for the San Rafael Swell. I have been visiting the Swell for the last 10 years to day hike, backpack and motorcycle trail ride. I have seen first hand damage caused by improper use and feel that the biggest problem is lack of enforcement. I have been to the Swell at least 25 times and have never once seen a ranger or law enforcement official. Until four or five years ago the Swell was a free for all. In recent years it seems to be much better. I feel that the proliferation of clubs and organized rides have greatly educated the average OHV user to the importance of proper trail usage and etiquette. Unfortunately, your new policies seem to penalize clubs and groups. This makes no sense as these groups work hard at teaching responsible trail use. Please continue the 50 vehicle group size limits and don't make plans and rules that hurt the most responsible users.	Trail marking and enforcement will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. With respect to the requirement for organized group SRPs, the Proposed RMP would require that all organized groups of more than 14/24 people within a WSA and in the remainder of the PFO (respectively) contact the BLM.
Chris	Olsen	OHV Route Identification	In summary, I oppose any radical changes and trail closures in the new plan. Whether certain BLM officials like it or not, OHV use is rapidly growing and MORE opportunities need to be created, not taken away.	Please see general comment response #19
Chris	Olsen	Process and Procedures	The multiple layered management plans you are proposing are confusing and hard to manage. Please disclose in advance all trail and camping closures accurately and without bureaucratic mumbo-jumbo.	Please see general comment responses #15 and #37
Craig	Olsen	Minerals and Energy Resources	Oil and gas developers should never have access to areas that contain unique natural wonders as those found in Nine Mile Canyon. Again as a citizen of the state I would hope that our proposed wilderness areas find protection in our regulations and laws.	Please see general comment response #101
Craig	Olsen	OHV Route Identification	It is my hope that as your RMP is updated, protecting the wilderness will be the priority. ORV's should be managed appropriately, confined to specific trails that are clearly identified and mapped.	Please see general comment responses #12 and #15
Michael	Olsen	Wilderness	As a part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act.	Please see general comment response #36
Ruth	Olsen	OHV Route Identification	It is important that the BLM designate specific trails in the RMP and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any open areas where ORV use is allowed without limitation.	Please see general comment responses #19 and #132
Ruth	Olsen	Process and Procedures	The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #12, #35 and #36
Lynn	ONeil	OHV Route	By and large the locals have been stewards of the land for close to one hundred years with little impact. Suddenly	Please see general comment response #19

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		Identification	the BLM decides it needs to PROTECT it by closing much of it. This isn't protection it's taking away the public right to access public land. Legal roads and trails should remain open until nature closes them and the BLM has a duty to follow the law the same as the population has a duty to follow it. The reason it is called public is because it belongs to the public the BLM was established to oversee it for the public not to keep it locked away from the public. Please reopen the roads and trails that have been closed to the public that have used them for many years and don't close any more to please an elitist few who don't even know the area they are attacking.	
Chris	Orndorff	OHV Route Identification	As a member of the Sage Riders Motorcycle Club, I know that we have spent close to $30,000 having trails in the Chimney Rock area (a vague description of a vast land) archaeologically surveyed and inventoried so that motorcycle races could be held on these trails and so that non-racers would also be able to enjoy these trails. These trails appear NOWHERE in your inventory! Your own archaeologist has gone so far as to recommend that the entire San Rafael Desert be declared an Area of Critical Environmental Concern (ACEC) because of "lithic scatters". How is it this man has a job? Think there might be some bias here? Bias that is not conducive to an objective plan? Or was there ever any intent on creating a subjective and balanced plan... The DRMP has no Travel Plan. A Travel Plan absolutely needs to be included. You need to acknowledge the existence of surveyed, GPSed and inventoried trails within lands covered by the DRMP. The entire area should remain designated OPEN unless specific routes can be objectively identified as needing to be closed.	See general comment responses #19, # 20 and #31
Chris	Orndorff	OHV Route Identification	And lastly, why is no one employed in the Price Field Office involved in motorized recreation? How can your office honestly hope to address the concerns of many thousands of Utahans without some familiarity with what they do? Kind of like having a building inspector who has no familiarity with building codes or construction!	Please see general comment response #89
Nancy	Orr	OHV Route Identification	However, they are on their way to becoming playgrounds for the thousands of ORVs that find it necessary to look for untrammeled areas once the current ORV areas have been rendered to loose sand which becomes fodder for dust storms. Those of us who prefer a chance to enjoy a quiet connection to these incredible areas are essentially being “run out of town” in favor of development and motorized usage, along with the animals which make their homes there. Does our species have the right to be so destructive?	Please see general comment response #19
Nancy	Orr	Process and Procedures	Please consider adopting the Castle Country Heritage Plan in your final RMP. I have been exploring these areas for years, and can assure you that many of them currently qualify for wilderness.	Please see general comment response #35
Nancy	Orr	Wilderness	I took the opportunity to attend the open house you held in Green River to see what the proposed management plan would be for much of my favorite wilderness. I was saddened to find out that there will be no more WSA’s proposed to protect the areas which are not currently under study.	Please see general comment responses #36 and #109
William	Orth	OHV Route Identification	As an avid and responsible off-road enthusiast for over forty years, I must protest the extreme closure measures being considered for the San Rafael area in Utah. Trustees of public lands have obligations both to the natural resource and to the citizens who own the land. Until far more convincing data is accumulated that points a convincing finger at off-road users as a primary source of degradation, such measures are uncalled for. There are rabid environmental interest groups who are strident in their demand to isolate such public resources from the very people who use them the most. This is not in the best interest of the majority of citizens. I urge you and your office to consider carefully all aspects of such draconian land closures and only consider actual hard data as opposed to interest-serving hyperbole that seeks to undermine our fundamental rights. I would be fully in support of sanctions against any off-road users who venture off established trails, who damage sensitive ecosystems or fragile vegetation and who camp in irresponsible ways. Please censure those who	Please see general comment response #19

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			actually create problems, but preserve the right of responsible outdoorsmen and women to enjoy our public lands.	
Dennis	Ostermiller	Recreation	Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment responses #37 and #81
Vicki and Mark	Overfelt	Minerals and Energy Resources	Do not allow for oil and gas leasing or on lands within America's redrock wilderness act, or sensitive cultural, riparian, or ecological areas.	Please see general comment responses #18, #36 and #101
Vicki and Mark	Overfelt	OHV Route Identification	Vehicles should be restricted to designated roads and trails throughout the entire state: In order to facilitate enforcement, there should be a "closed until posted open" policy; there needs to be adequate opportunity for both motorized and non-motorized recreation, while avoiding conflicts between these two groups.	Please see general comment response #19
Don	Owens	OHV Route Identification	While the BLM states that the San Rafael Route Designation Plan will be incorporated into the new management plan, but does not tell the public that other management 'layers' will make significant road ant trail closures. My comments to this that the BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment response #20
Don	Owens	OHV Route Identification	The BLM is proposing sever group size limits that put clubs large families, and the American Public under unfair and arbitrary restrictions. My comment: Although I'm out on these lands by myself there is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands... The BLMs proposed many overlapping management 'layers' in the San Rafael Swell. Each layer brings with it discrete management restrictions, yet, aren't drawn along any recognizable geographic boundary making any kind of compliance virtually impossible. My comment: The BLM needs to know that I will not tolerate overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I am 100% opposed to all of the management 'layers' outlined in the draft plan.	Please see general comment responses #37 and #81
Stephen	Pace	Minerals and Energy Resources	I have reviewed the Price RMP and do not believe it adequately protects this important area. I am especially disappointed that the proposal would allow almost unfettered gas and oil development in the fragile desert environment of what would at most be an insignificant amount of net recovered energy but at the price of irreparable damage to the entire ecosystem.	Please see general comment response #18
Stephen	Pace	OHV Route Identification	I continue to be appalled at the increasing ORV damage that the BLM is presiding over in the San Rafael area. I frequently engage in non-motorized recreation in the area and it seems that the BLM has no will or intention to do anything other than stand by while ORVs it. I have several times complained to the Price office about illegal vehicle use in the Swell and the response I always get is "there's nothing we can do about it, lighten up!" I believe that the Castle County Heritage plan, coupled with serious attempts at enforcing current law, is a far better approach than what the Agency has so far proposed.	See general comment responses #12 ,#19 and #35
Linda	Padula	Process and Procedures	Do the powerful oil and gas companies have so much control over you that would not even consider alternatives to this terrible destruction of the Redrock Wilderness. Can't you even consider our future generation of children along with the wild plant and animal life that exist there? DO NOT try and tell me that it is our best interest to do this. There is very little to be found there. IT IS ONLY FOR THE PROFITS OF THE OIL AND GAS COMPANIES NOT THE AMERICAN PUBLIC. TELL THE OIL AND GAS COMPANIES TO RESEARCH ALTERNATIVES	Please see general comment response #2, #36 and #101

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			METHODS AND STOP CONSIDERING THEIR PROFITS.	
Michael	Parker	Transportation and Access	I oppose land and trail closures to any and all people. We the people should have access to our public lands. There is too much manipulation and slanting of the facts.	Please see general comment response #10
Michael	Parker	Transportation and Access	The smoke and mirror technique and unreasonable timelines that are often implemented into these acts must end. The trail systems should be open unless specifically marked closed. I hope you will consider the ramifications of land closure and the impact that it has on the future of our children.	Please see general comment response #10
Reece	Parker	Wilderness	These lands belong to all Americans and should be protected and not developed. I would also like to express my belief that these areas should be protected as de facto wilderness areas until Congress can decide whether or not to provide permanent protection. That means restricting the development of any new roads so that maximum protection can be attained.	Please see general comment response #36 and #114
Robin	Pavesi	Minerals and Energy Resources	Please protect Utah's magnificent public lands from the irreversible harms of oil and gas drilling!	Please see general comment responses #1, #36 and #101
Robin	Pavesi	OHV Route Identification	Prohibit ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate.	Please see general comment response #19
Michael	Pendleton	OHV Route Identification	As a user of this area with both motorized and equestrian I would like to see the new RMP mirror what is already in place with Sids Mountain for horses and the Coal wash area for ATVs being left open.	Please see general comment response #19
Missy	Perkes	OHV Route Identification	I am also urging that you designate trails for off-road vehicles so that these vehicles will not disturb wild life, cause soil erosion, or destroy plant life. Please make detailed signs and maps so that individuals who wish to use these sensitive areas will know where they are permitted to go.	Please see general comment responses #15 and #19
Missy	Perkes	Wilderness	I am urging the BLM to protect these areas from development. Especially Utah's own San Rafael Swell, Desolation Canyon, Nine Mile Canyon and Muddy Creek. These areas should not be offered to oil or gas companies for drilling. They should be preserved for our generation as well as for those to come.	Please see general comment responses #36 and #101
Chris	Perri	OHV Route Identification	I am troubled that many of the routes I have been traveling through the San Rafael Swell will be closed in the future. Apparently the current route designation plan will be honored in the new DRMP, but other planned management "layers" will in fact close many routes. I am highly opposed to the closure of any current routes! In fact, it seems as if the BLM is purposely hiding the closure of many routes by not providing clear large scale maps in the DRMP documents. I want to know EXACTLY which current open routes may be closed under EACH of the new alternatives. I understand the Chimney Rock and Summerville Trail system are supposed to remain open, but this is not on the preferred alternative route map. Also, many of the open routes on Map 2 are actually not legally open for ATV's. How many miles of roads on all the other maps are actually illegal for ATV's and OHV's?... I feel that the Chimney Rock/Summerville and Humbug trail systems should be left open, as well as the Dick Brass system... I would like to see links to the Arapeen Trail System designated.	See general comment responses #19,# 20, #31, #37 and #81
Chris	Perri	OHV Route Identification	Another issue that has many of my motorized cohorts up in arms is the future possibility of group size restrictions. This is not only unnecessary but appalling. I DO NOT support national park style group size restrictions. The proven 50 vehicle limit should continue. Special permits for very large groups (such as when SUWA has their shindig at the Hidden Splendor) are appropriate.	Please see general comment response #81
Chris	Perri	Recreation	I also oppose any restrictions on primitive and dispersed camping. In an area as vast as the San Rafael desert, there is really no need to place restrictive limits or guidelines on where or when camping can be or should be available.	Please see general comment response #81

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William	Perritt	Minerals and Energy Resources	Stop issuing gas and oil leases in the management area. Utah's redrock wilderness is a national treasure. Allowing industrial development of the area's tiny resources is tantamount to using a cathedral as a garbage dump.	Please see general comment response #101
William	Perritt	OHV Route Identification	Limit and monitor ORV use. A person's right to recreational choice ends with destructive activities. No one "needs" to run an ORV through an ecologically sensitive area. These activities destroy not only cryptobiotic crust but ruin the values of solitude and silence.	Please see general comment response #19
William	Perritt	Socioeconomics	Review of the proposed Price management plan causes me grave concern over the future of Southeast Utah's special places. It is imperative wilderness values be protected not only for ecological values, but for far-reaching economic values. Without quality wilderness, the region's lucrative wilderness tourism business will perish.	The Proposed Plan/FEIS preserves, protects and maintains an additional (relative to the current situation) 97,100 acres of wilderness characteristics on lands managed by the Price Field Office. Additionally, the Price Field Offices manages an additional 526,960 acres as Wilderness Study Areas. The BLM is required under FLPMA to manage for multiple-use and sustained yield, and has provided a range of alternatives in its DEIS ranging from a high degree of resource protection to a high degree of commodity extraction, subject to current laws and policies. The Proposed Plan/Final EIS strikes a reasonable balance between resource protection and commodity extraction.
Dirk	Peterjohn	OHV Route Identification	My main concern is the precedent this would set in losing access to the existing and future trails... There is ample area for young/healthy hikers to enjoy a pristine wilderness experience without restricting OHV access to much of the land. I fully support the restricting OHVs to roads and trails. I also support penalties to those who abuse their access privilege... I urge you to consider leaving all existing roads and trails open to OHV use and to continue to improve those trails for the enjoyment of the majority of responsible users.	Please see general comment response #19
Rachel	Peters	OHV Route Identification	Please designate specific ORV routes and ensure that ORV use minimizes impacts to the environment and to the experience of other visitors.	Please see general comment response #19
Rachel	Peters	OHV Route Identification	Make sure that any off-road trail designation plans will allow for a reasonable balance between motorized and non-motorized travel (including mountain biking, hiking, horseback riding, etc.);	Please see general comment responses #19 and #79
Rachel	Peters	OHV Route Identification	Make sure that any off-road trail designation plans will implement effective and frequent monitoring of ORV impacts; set clear benchmarks, which if exceeded, trigger immediate closure of an area to ORVs; and plan and budget for adequate enforcement of travel plans. If monitoring and enforcement cannot be effectively accomplished due to lack of personnel or resources, the BLM should not allow ORV use.	Please see general comment responses #15, #19, and #147
Rachel	Peters	OHV Route Identification	Make sure that any off-road trail designation plans will continually evaluate ORV impacts on all resources and uses in the planning area.	Please see general comment response #19
Rachel	Peters	OHV Route Identification	Make sure that any off-road trail designation plans will prohibit all cross-country motorized travel.	Please see general comment response #19
Rachel	Peters	Wilderness	Please keep oil and gas and ORVs out of areas proposed for wilderness. Please refrain from offering oil and gas leases in proposed wilderness areas, and to designate special protection in the RMPs for proposed wilderness lands. All resource values should be considered equally	Please see general comment response #12, #36, #101

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			including wilderness, riparian habitats, wildlife, cultural resources, non-motorized recreation, fisheries, visual resources, water quality, air quality.	
Rachel	Peters	Wilderness	Make sure that any off-road trail designation plans will protect wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act from destructive ORV use	Please see general comment responses #12, #36, and #144
Rachel	Peters	Wildlife and Fish	Make sure that any off-road trail designation plans will similarly protect critical wildlife habitat, riparian areas and wetlands and other fragile ecosystems from destructive ORV use.	Please see general comment responses #3 and #40
Wayne	Peters	Alternative Maps	Now in regard to Map 3-27 and ACEC's. The BLM admits that most of the Central, East and Southern half of the PFO area has Wilderness value. I do too. You did a good job a year or so ago, I think in 2003, when you sent me the proposed roads thru the San Rafael Swell area. Don't let the Utah counties or the State use the old RS 2477 law to open up more of these roads and others. I realize that Secretary Norton has given you the go ahead, especially since the deal she signed with ex-governor Leavitt, but I understand there is a lawsuit out, so I hope you lose.	BLM has not designated routes based on RS 2477 claims. OHV management in the San Rafael Motorized Route Designation Plan would not be changed in any alternative other than Alternative E.
Wayne	Peters	Minerals and Energy Resources	Oil and gas leasing and Map 3-27 and ACEC's go hand in hand. I believe in 2001, President Bush gave an order to the DOI to drill everywhere for gas and oil. I know the BLM is supposed to have multiple use, but one of your mandates is also to preserve SCENIC BEAUTY. In most of the Central, East and Southern part of the PFO, this does not mix. I've seen these oil pads when I drive thru Kansas, Oklahoma and the Texas Panhandle. They do nothing for the landscape, and the Red Rock Country is so outstandingly more beautiful. Years ago, I came across an abandoned well site and I was not too happy how they had left the site. If it was not for the high price of gasoline, these companies would not even bother with this area. I hope you read "An Analysis of Utah Oil and Gas Production, Leasing and Future Resources" by Mark Lemkin.	Please see general comment responses #18, #36 and #101
Wayne	Peters	Transportation and Access	First, ORV's and roads. You are proposing way too many roads. We do not need all of those roads. There are way too many now. I go to Utah for peace and solitude. I stop in an area and I get out and use my legs. I am getting up in years, but the last thing I want is a road everywhere. The ORV clubs are asking for way too many roads and ATV trails, this includes dirt bikes.	Please see general comment response #10
Kent	Petersen	Transportation and Access	Alternative D appears to follow current management on OHV travel. This should be maintained. Keep the following points in mind: 1. Continue to work with Emery and Carbon Counties to encourage travel only on designated routes. Maintain all of the current routes. 2. When the counties are successful with their RS 2477 claims put these roads back in the system. 3. Consider the importance of travel to archeological and paleontological sites. Many of the people who visit these sites are older and it is very difficult for them to get there if they cannot use a vehicle. Proper investigation of paleontology sites will always require vehicular access. Make sure the RMP allows for future digs.	See general comment responses #11 and #19. With the Proposed RMP, no areas would be open to cross-country travel. Increasing access to cultural sites increases the potential for these sensitive areas to damaged, whether purposefully or inadvertently. Cultural resource sites allocated to public use will have their scientific information recovered to reduce this impact, as well as have access provided for public use. Allowing vehicular access for scientific paleontological data recovery can be allowed through administrative waivers, in consideration of all RMP/EIS program goals. As such, providing access to as yet undiscovered paleontological localities is an RMP/EIS implementation decision to

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				be addressed on a case-by-case basis.
Alan	Peterson	ACEC	I am totally against your use of Area of Critical Environmental Concern (ACEC) as a way to limit or restrict motorized travel or cattle grazing in the Tidwell Draw Mining District. In fact I am opposed to ALL of your proposed ACEC designations because I see this as a biased attempt by your staff to create de-facto Wilderness where none exists. For instance, the fact that your staff archaeologist proposed the entire San Rafael Desert to be an ACEC for "lithic scatters" shows to me that your staff is willing to use any excuse available to eliminate people and vehicles from public lands... I would like to see your plan modified in order to allow quicker and expanded development of gas production in the West Tavaputs and Nine Mile Canyon area. The rock-art and cultural sites have co-existed for nearly 50 years with gas development in the area and with today's modern technology we can expect even better and safer results. I ask that Nine Mile Canyon NOT be designated as an ACEC.	Please see general comment response #30 and #141
Alan	Peterson	OHV Route Identification	Recreation is another important part of quality human life. It is also an important element of our local economy. I feel that your plan lacks an adequate route designation plan (i.e. travel plan). Therefore I ask that you designate ALL existing routes as open to motorized vehicle travel until the time that you can evaluate proposed road or trail for closures on a case by case basis. I feel that the emphasis should be upon routes being OPEN unless closed through individual analysis and for good reason. Map A would be a good starting point for this inventory and the document should be considered "live" so the public could continue to provide additional route inventory information.	Please see general comment responses #15 #19
Alan	Peterson	Minerals and Energy Resources	All lands not specifically reserved should be OPEN for full resource development including, but not limited to; natural gas, oil, coal-bed methane, timber, coal, gypsum and water.	Please see general comment response #18
Alan	Peterson	OHV Route Identification	I ask that the RMP formally designate ALL existing roads and trails as OPEN to motorized travel. I suggest that closures only be done on a case-by-case basis. The burden of proof should be on those asking for closure NOT on those asking for the current OPEN status to be maintained. The preferred alternative also lacks an adequate route inventory and travel plan. The BLM's own OHV strategy requires field offices to designate a travel plan during the RMP process, yet this DRMP fails miserably. I ask that the BLM immediately remedy this by working with the local governments and user groups and then designate ALL roads and trails as OPEN for motorized use.	Please see general comment response #19
Alan	Peterson	Process and Procedures	As FLPMA requires, the BLM must work with the local governments during the RMP process in order that the finished product be in harmony with the local government (County) master plans.	Please see general comment responses #29, #142 and #145. While County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM has identified these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options
Alan	Peterson	Recreation	Dispersed camping is a very popular and important use of public lands. I feel that your limitations and group size restrictions to non-competitive and non-commercial activities is too extreme. I ask that dispersed camping be allowed to continue and only be eliminated on a case-by-case basis when it is proven that it is needed. I ask that you maintain the group size limits at the current level of 50 people. I feel that the number of vehicles should also	Please see general comment response #81

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			remain at 50 before any type of special permit or letter of agreement be required.	
Alan	Peterson	Socioeconomics	The preferred alternative lacks an adequate socio-economic study and one should be done with the involvement of local governments.	See general comment responses #132 and #133.
Arthur	Peterson	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment response #12
Tim	Peterson	Transportation and Access	I write in support of aircraft use in public land. This has the least impact on the land compared to any other form of transportation, especially when it comes to noxious/invasive weeds. Also the financial impact to the economy is a positive one because of the use of aircraft in the amount of multiple millions. Any restriction would have a profound impact on the economy and would discriminate against the best stewards of the land.	Please see general comment response #21
David	Petty	Transportation and Access	The group permits, road/trail restrictions would severely limit the peoples right in areas of recreation and access to enjoy public lands.	Please see general comment response #10
Tom	Pfaff	OHV Route Identification	I have enjoyed all the 4x4 trails in the San Rafael area for many years. I spent some of my best years with my Father in our old 42 jeep. Now I spend time on all the trails with my family. I feel as a tax payer I have the right to enjoy our public lands and enjoy my passion as much as any other group. Our group adheres to all the tread lightly rules. I feel all the 4x4 trails should stay open as they have always been, but do not wish to see new roads developed. I believe that no one special interest group should be allowed to decide how everyone uses the land. There is room for everyone to enjoy the San Rafael if things are left as they are.	Please see general comment response #19
Melissa	Pilkington	Minerals and Energy Resources	I would like to comment briefly on your draft proposal to open up the Price Resource Area to oil and gas drilling. I believe the plan is too invasive and will have widespread consequences to the natural landscape that are not being considered for the small amount of energy that will be generated from this pocket of resources. This is not an even tradeoff and no respectable American would allow this proposal to pass. I urge you to abandon this proposal in the interest of future generations of children who will inhabit this area of the country and instead consider the Castle Country Heritage Proposal offered to you by the Southern Utah Wilderness Coalition. Please do not be swayed by the big money interests who are willing to sacrifice good sense in the face of a one-time profit.	Please see general comment response #18
Chris	Plumb	OHV Route Identification	Please take into consideration of all the off roaders who want to travel to Utah and spend money and ride your scenic San Rafael Swell. I would like to see this area designated multi purpose so every body could enjoy it	Please see general comment response #19
Kathleen	Pollett	Minerals and Energy Resources	I talked with an older Halliburton employee that works on the ground and he said that the rate of drilling was very high. He was not comfortable with how much and how fast drilling was happening. I told him I would add his worry to my letter.	Please see general comment response #18
Kathleen	Pollett	OHV Route Identification	I hope that the new plans will help me and my family come camping and hiking there without large groups of ATVers running what I consider easily damaged land.	Please see general comment response #19
Barb	Pollyea	Minerals and Energy Resources	All areas within America's Redrock Wilderness Act should be protected from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply resulting from these activities can be measured in weeks and days, while crucial habitat for deer, elk, bear cougar and other wildlife will be lost forever -- to the detriment of Utah's tourist economy and displeasure of future generations.	Please see general comment responses #12, #36 and #101

First Name	Last Name	Category	Comment	Response
Barb	Pollyea	OHV Route Identification	I urge the BLM to protect these fragile places from ORVs. There should be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that should also be protected from vehicles that can, and do, go wherever they please: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; the Price River proposed wilderness area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment responses #12, #19 and #36
Barb	Pollyea	Process and Procedures	I think the citizen's alternative, the Castle County Heritage Plan, is far more visionary in the balance it strikes between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Barb	Pollyea	Soil, Water and Riparian	The soils, plants and riparian areas in this part of Utah are among the most fragile in the world. Teddy Roosevelt and other visionary Republican conservationists would turn over in their graves if they knew of our federal government's mismanagement of public lands in the interior West.	Please see general comment response #67
Lisa	Poppleton	Minerals and Energy Resources	How tragic and, it seems to me, senseless that this canyon, so rich in history, spiritual meaning, wildlife, and natural beauty, should be opened to industrial development. I don't like to talk about "value" in such a context, but since that seems to be the only factor by which this society judges whether to develop or preserve natural lands, I argue that the timeless value of an undisturbed Nine Mile Canyon to the American people far outweighs the temporary benefit of any oil and gas deposits to be found beneath. The permanent disturbance and likely destruction of the canyon's ecosystem and human cultural heritage for oil and gas extraction becomes even more horrific to contemplate when one reads that the US Geological Survey estimates there are only a few weeks of deposits there to extract. We must not sacrifice Nine Mile Canyon to improve the profit margins of oil and gas companies. The Bureau of Land Management, as a department of the Federal Government that is charged with wisely administering the lands that belong to us all, needs to protect this natural and human heritage from short-term corporate greed, the pounding of heavy trucks, dynamite and drilling. All survey and extraction activity should immediately cease in the area, and Nine Mile Canyon should be allowed to remain intact, a natural and sacred preserve that will continue to enrich our lives in priceless ways as it has for millenia.	Please see general comment response #18 and #101
Shawn	Porter	Minerals and Energy Resources	As a lifetime resident of Utah, I have watched as Legislative officials with personal gain interests, have, and continue to erode the quality of life for generations to come. Please, for humanities sake, do not bend to the profit of few people, especially for such a small amount of petroleum. Utah's motto used to be, "Utah, A Pretty Great State," meaning that the states greatest resource is its natural beauty. By allowing drilling in Utah's red rock country you will in effect be destroying its greatest resource.	Please see general comment response #18, #36 and #101
John	Potter	OHV Route Identification	My main concern is the lack of a Route Designation Plan(i.e. travel Plan) At this point, I see the BLM's only just alternative to be designating the entire inventory as 'OPEN' as we, the American public, are not presented with the inventory. Any other designation would have to be subject to public comment through a THOROUGH inventory and, finally a route designation process. The BLM really MUST involve local OHV groups in the designing and maintaining of motorized trail system.	Please see general comment responses #15 and #19
John	Potter	OHV Route Identification	It seems imperative to me that the BLM hire recreation staff that has an interest in training in OHV management.	Please see general comment response #89
John	Potter	Recreation	This is extremely unfair - an SRP should not be required for ANY non-commercial activities.	Please see general comment response #81

First Name	Last Name	Category	Comment	Response
Susan	Potts	Minerals and Energy Resources	I strongly believe that the BLM should refrain from offering oil and gas leases in the areas proposed for wilderness designation in America's Red Rock Wilderness Act.	Please see general comment response #101
Susan	Potts	OHV Route Identification	The BLM should craft a reasonable balance between motorized and non-motorized travel; include a good trail enforcement plan; restrict ORV use from wilderness study areas, BLM-Inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act; and restrict ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	Please see general comment responses #12
Susan	Potts	OHV Route Identification	Please protect this area, don't allow it to be destroyed by extractive industries and OHV's. I see so much of that happening all around the west and it saddens me to think the BLM is catering to the needs of greedy businesses and irresponsible off-roaders rather than working to protect and preserve our beautiful wild lands.	Please see general comment responses #12, #15, #19 and #36
Susan	Potts	Process and Procedures	As a Nevadan who travels to Utah frequently to hike and camp, I was upset to learn that the recent draft revision to the Price Resource Management Plan is geared to the interests of the oil and gas industries and does not protect this special area for current and future generations to enjoy or for the protection of the plants and animals that need this land for their survival. It seems this draft revision to the RMP favors a few special interests at the expense of the American public and the land under your care. It leave 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount or land open to leasing without restrictions. It also allows for far too much use by off road vehicles and does not have enough land set aside for those who want to enjoy a quiet natural experience... I am asking you to support the Castle Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you. It is the best plan for the long-term interests of this land. Please, do the right thing and work to protect, not destroy, our remaining beautiful natural areas.	Please see general comment responses #35, #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Susan	Potts	Process and Procedures	The Castle Country Heritage Plan does protect Nine Mile Canyon and other areas while allowing some oil and gas development and some off-road vehicle use. Please, work to protect our precious public lands for current and future generations. Do not only serve the desires of businesses doing extractive processes i.e. oil and gas development and/or the off-road vehicle community.	Please see general comment response #35
Susan	Potts	Recreation	I believe that the BLM's plan should be revised to more effectively protect proposed wilderness and more equitably assess the value of the varied uses of public lands, including non-destructive recreational uses.	Please see general comment response #14 and #36
Susan	Potts	Soil, Water and Riparian	These lands' riparian and critical environments should be protected from livestock and ORV use and subsequent impacts. These lands are important for more that the oil and gas, but for clean air, water, wildlife habitat, and peaceful recreation.	Please see general comment response #67
Susan	Potts	Soil, Water and Riparian	Additionally, these lands' riparian and critical environments should be protected from livestock and ORV use and subsequent impacts. These lands are important for more that the oil and gas, but for clean air, water, wildlife habitat, and peaceful recreation.	Please see general comment response #67
Susan	Potts	Transportation and Access	The Price RMP must compromise by allowing for some access routes while ensuring protection of fragile habitat and cultural resources. The BLM should craft a reasonable balance between motorized and non-motorized travel; include a good trail enforcement plan; restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act; and restrict ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	Please see general comment responses #10,#12 and#15
Susan	Potts	Wilderness	I believe that the BLM's plan should be revised to more effectively protect proposed wilderness and more	Please see general comment responses #1, #36

First Name	Last Name	Category	Comment	Response
			equitably assess the value of the varied uses of public lands, including non-destructive recreational uses.	and #132
Joan	Powell	OHV Route Identification	You need to have a travel plan FIRST then do your RMP. Set up a council, then monitor it, you'll see how much people really do care, and they do become sensitive about the area that surrounds them.	Please see general comment responses #15 and #19
Joan	Powell	OHV Route Identification	You need the travel plan in place first, then go after the areas that need to be protected.	Please see general comment responses #15 and #19
Thomas Michael	Power	Socioeconomics	One of the major justifications for commercial mineral development on public lands is that such mineral development will stimulate the local economy, providing high paid jobs, a substantial flow of income to mineral workers, and a substantial flow of revenues to local schools and governments. The flow of these mineral revenues through the local economy is expected, in turn, to stimulate other local businesses leading to "multiplier" impacts and ongoing improvements in local economic well being. Although these are the popularly expected results of commercial mineral development, as this report will document, ongoing mineral production in Carbon and Emery Counties, Utah, has not had this effect. Despite rising mineral production, employment and payrolls in the mineral sectors have been declining, overall job and real income growth has lagged, relative per capita incomes are low and growing more slowly than the rest of the state, and poverty and unemployment rates are high.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes the economic contribution of energy production to local communities. A discussion of this analysis is provided in Chapter 4, Section 4.6. Additional information on the mining industry's employment and earnings is included in the socioeconomic baseline report.
Thomas Michael	Power	Socioeconomics	The DEIS estimates that this level of development and production would, directly and indirectly, lead to 85 new jobs in Carbon and Emery Counties (DEIS Section 4.12.1). Total employment in these two counties in 2002 was about 17,000. Thus, the new jobs associated with CBM development would represent about one-half of one percent of total employment. Since 1989 the annual employment growth in the two counties has fluctuated from year to year, averaging a gain of about 186 jobs. The extreme annual fluctuations were a gain of 919 and a loss of 360. Clearly the 85 jobs associated with the projected CBM development represent a relatively small change compared to the fluctuations in employment to which these counties are accustomed. On average, it represents about half a year of normal job growth.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production, grazing, and recreation to local communities, such as Emery and Carbon counties.
Thomas Michael	Power	Socioeconomics	This small number of CBM-related jobs will not all go to current residents of Carbon and Emery Counties. Gas well development requires a specialized workforce and specialized equipment and materials. The workforce has to be mobile, willing to move to wherever drilling activity is currently taking place. Equipment and material suppliers to gas development companies are located in the larger urban areas that are regional centers for drilling activity. Carbon and Emery Counties are not within a commuting zone of such an urban area. As a result, many of the direct and indirect jobs associated with CBM development will go to workers who commute in from outside the region and to businesses located outside the region. This suggests that extensive additional CBM development will not have a major impact on local school or government budgets.	See general comment response #132. The Proposed RMP/Final EIS evaluates the socioeconomic impacts of having access to BLM lands for multiple uses. This includes an evaluation of the economic contribution of energy production to local communities, such as Emery and Carbon counties. A discussion of this analysis is provided in Chapter 4, Section 4.6. An additional socioeconomic technical description document which details the methodology, calculations, results and all sources used is provided including direct, indirect, and induced effects.
David	Pratt	Minerals and Energy Resources	I am completely opposed to ANY oil and gas development in the Price, Utah area,	Please see general comment response #18
David	Pratt	OHV Route Identification	I am writing to encourage your support of the Castle Country Heritage Plan to protect lands included in America's Redrock Wilderness Act from exploitation by commercial and/or ATV and ORV uses. Such uses will make impossible the continued enjoyment of these lands as places where citizens of our great country can enjoy the	Please see general comment responses #12, #35 and #36

First Name	Last Name	Category	Comment	Response
			great outdoors free of air and water pollution, noise, and destruction by ORV's. My wife and I are frequent visitors to Utah; as residents of Pennsylvania, we know full well the impact that mining and other commercial activities can have on natural beauty. Utah is unique, and that uniqueness MUST be protected. Please act to preserve these special experiences for all future generations of Americans.	
Tracey	Price	Minerals and Energy Resources	We need to protect our public lands from Oil/Gas development. These public lands need to be protected for all generations. We also need to protect plants, wildlife & ancient artifacts from development of Oil Wells. We no that there is a limited amount of resources & as a country we need to move towards other means of energy. Before anything is agreed upon, studies must be conducted to ensure the protection of ancient artifacts, plants & wildlife. Once destroyed, it will never return to the same state.	Please see general comment response #18
Tracey	Price	OHV Route Identification	Also it is very important to protect our public lands from uncontrolled ATV users. We must implement a plan to prevent unlimited use & destruction. I don't think that ATV users should be eliminated, just controlled to provide areas that do not have the impact from these machines. I recently was in the San Raphael Swell & it is a shame what has been allowed. Some the ATV riders show no respect for the environment & drive these vehicles over delicate areas causing scars, erosion & the decimation of plant life. There must be rules & regulations for these users, such as stay on the trail & do not create new trails. This mentality should not run amuck, I've been camping at the Swell & other places & had people driving their ATVs through your camp site at all hours of the night & morning. There needs to be respect for others when using public lands.	Please see general comment responses #12 and #19
Rebecca	Procter	Minerals and Energy Resources	I most strongly urge that you take the responsible course of action and stop any move toward oil and gas drilling in Nine Mile Canyon.	Please see general comment response #18
Michael	Quinlan	Minerals and Energy Resources	The lands in central Utah are an irreplaceable national treasure for Americans that appreciate the natural environment. These areas should be given the maximum possible protection from oil and gas development. The amount of oil and gas present in this region is trivial, and these resources cannot be extracted without serious damage to the landscape.	Please see general comment responses #18 and #101
Michael	Quinlan	OHV Route Identification	In addition, ORV use should be carefully controlled, especially in Wilderness Study Areas and other areas that have been recommended for protection by the Redrock Wilderness Act. Damaged areas should be rehabilitated whenever possible, and no locales should be designated “open areas" where ORV use would be allowed without limitation.	Please see general comment responses #12 and #36
Michael	Quinlan	Wilderness	I am particularly concerned that the BLM favors an RMP that would open huge tracts of wilderness-quality lands to oil and gas development.	Please see general comment responses #36, #101 and #109
Rosemarie	Quintal	Minerals and Energy Resources	I understand through the NRDC that you are considering to violate the Roadless Rule of Former President Clinton and the Redrock Wilderness Act to allow drilling for oil in 2.5 million acres of Utah Wilderness.	Please see general comment response #101
Larry	Rader	Minerals and Energy Resources	While I appreciate and enjoy the beauty of areas such as these wildlands and want them protected as much as is feasible, I think we also have a responsibility to the American people to assure an adequate national fuel supply. It often seems that the same people who protest opening up of lands for hydrocarbon development are the same ones that complain that the President and Congress should do something to control increasing fuel prices. How better to influence prices than to increase the supply? Nobody I have known in 25 years in the oil business has EVER unnecessarily harmed any lands on which we operate. We take great pains at great expense to cause as little disturbance as possible. But, at a time when we import over 60% of our fuel, a good environmental program balanced with some good common sense is in order. Please open up these lands for development!	Please see general comment response #18

First Name	Last Name	Category	Comment	Response
Michael	Radkowsky	OHV Route Identification	I support the Castle Country Heritage Plan because it protects lands included in America's Redrock Wilderness Act from oil and gas development, and from off-road vehicles including ATVs and dirt bikes. Please protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling. If you don't you will be allowing the permanent destruction of this beautiful area, because such activities degrade water quality, erode soil, endanger wildlife habitat, and destroy rare, essential riparian areas.	Please see general comment responses #12, #35 and #36
Michael	Radkowsky	OHV Route Identification	Please also designate specific trails for off road vehicles in the RMP, and ensure that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement.	Please see general comment response #19
Bill	Rainbolt	Minerals and Energy Resources	Industry in the Price RMP area has done a very good job of exploring and developing in an environmentally sensitive manner. If we don't produce energy in the U.S- and we can only find it where it is- where are we going to get it? It's always in someone's backyard, but public lands are not just for the few- they belong to the country, all of us. This plan needs to have real balance- true multiple use.	Please see general comment response #18
Michael	Ralphs	Livestock Grazing	Livestock grazing should continue to be permitted on existing allotments. Management plans should be implemented to improve range conditions. Monitoring studies should be installed on each allotment to monitor ecological trend and condition, and management adjusted to ensure improving conditions.	Please see general comment response #33
Michael	Ralphs	Vegetation	Noxious and invasive weed control should have highest priority. Prevention should be stressed; weed free hay, cleaning of recreation vehicles. Populations of noxious weeds should be mapped and controlled annually by the most effective methods available.	Please see general comment response #24
Diane	Rambo	Process and Procedures	As an American concerned with the legacy I will leave my child, I urge you to abandon your plan for the 2.5 million acres managed by the Bureau of Land Management’s Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act.	Please see general comment responses #12 and #36
April	Rampton	Cultural Resources	I am writing as a concerned citizen on behalf of our wildland and natural resources. They only have my voice! I am concerned about the destruction of our land and the history of its previous inhabitants. This state of Utah has a past not easily seen by most people. Least of all not big oil companies looking to improve the balance of their check books. Did you know that some mosses take 2000 years to grow? And if untouched you can see 12 to 1500 year old footprints still on the surface? I have 2 children that are 12 and 14. They are learning to read and understand petroglyphs. These panels are very fragile and once destroyed can never be replaced. I taught them what took me years to learn. I fear that they will only be able to teach their children by photograph because at the rate of destruction currently going on there will be no panels left for their children to see and study.	Please see general comment response #9
Jonathan	Ramsey	Process and Procedures	The Redrock Wilderness issue is one place you can draw your line. You can have a direct influence on the now and the future. You can begin to pressure industry and consumers to realize the frivolousness of continued exploitation of our natural resources in socially and environmentally irresponsible ways. Someday, the BLM, the USFS, the FWS, and the NPS will all have to take that stand or find themselves in a loosing battle in terms of resource reservation, economic depravity, and health consequences. Stand now. Stand up, people! This is why you are in this position, why you traveled this route and pursued this journey. Stand up and say with dignified poise, "enough."	Please see general comment responses #12, #36 and #101
Brad	Rasmussen	OHV Route Identification	Please provide clear maps of existing trails and proposed trails so we know where we are going to have limited access. Please keep the existing trails open.	Please see general comment responses #15, #19 and #20
Brad	Rasmussen	Transportation and Access	I am often frustrated when I go riding and I find trails that have been marked as no access for ATV's. I can often see the roads shown on quad maps. I do not believe people should start blazing trails anywhere they want. However, I do not feel it is in the best interest of the public to close existing access to the public lands.	Please see general comment response #10

First Name	Last Name	Category	Comment	Response
Brad	Rasmussen	Transportation and Access	As the population continue to grow there will be additional demands placed on our public lands. It appears to me that there is a small minority of people that are trying to limit easy access to the land so only those who are willing to work extremely hard will have access. With only 0.4% of the area being roads it would appear to me that there is plenty of ground to accommodate those who are willing to get off the trails.	Please see general comment response #10
Brad	Rasmussen	Transportation and Access	The root of the demand for access to this area is the population growth in the west. We must always remember man is part of the environment not a separate entity.	Please see general comment response #10
Brian	Rau	Transportation and Access	My wife and I have flown into Mexican Mountain, Mineral Canyon, Fry Canyon and Angel Point backcountry airstrips during trips to your area. I believe that visiting your area by air is a low impact use as it is less disturbing then driving a vehicle down winding backcountry roads with the associated dust and noise. We appreciate being able to visit your area by air. Please continue to allow its use by including the continuing use of Backcountry Airstrips in the Resource Management Plan.	Please see general comment response #21
Barbara and Jim	Rausehousen	OHV Route Identification	I am interested in knowing what the BLM intends to do with the Chimney Rock/Summerville Trail System, as well as the Arapeen Trail connector routes. I hear that the OHV community submitted detailed route information for these trail systems early in the process. I am VERY disturbed to find that these trails aren't on any map in the Appendix. I object to having these trails ignored. The correct procedures were followed so the OHV community's input should not be ignored. Please put out a supplemental draft environmental impact statement that discloses which routes are open under the BLM's preferred alternative.	Please see general comment responses #20 and #31
Larry	Read	OHV Route Identification	The proposed draft plan to develop 2.5 million acres managed by the BLM would do significant harm to this unspoiled region. 1.5 million acres are part of the Redrock Wilderness Act, with another 1 million that qualify for protection. Oil and gas development would open all these wild lands to scaring roads, gravel pads, dump sites, chemical contamination and increased cross-country ORV use. I'm glad to see BLM support for proposals to limit cross-country ORV use to specific trails. But opening new trails to ORV use that the draft plan proposes should not occur. Also with new roads for oil and gas development, there will be greater access for ORVs and enforcing off-road use will be difficult. Please help retain part of America's heritage by preserving its wild lands. Revise the draft plan now proposed for congress with a more balanced plan to protect significant areas from oil and gas development and ORV use. Including, but not limited to the Book Cliffs, Desolation and Labyrinth Canyons.	Please see general comment responses #12 and #36
Lois	Read	Wilderness	Please resubmit a draft plan to congress that protects Utah's spectacular redrock country. Previously under study for wilderness consideration, these lands should have more protection from oil and gas development and ORV use than calls for in the current draft plan. 1.5 million acres of natural, undisturbed lands that meet all the requirements for wilderness inclusion should not be scarred and hacked up by roads, structures, chemicals and noise. A very small percentage of America's lands are wilderness. It is not asking too much to protect these lands that would add to America's unspoiled diverse landscapes.	Please see general comment responses #36 and #143
Dean	Reed	OHV Route Identification	Why is it that BLM has become the trail closing king as of lately? I like to ride and use; BLM does its best to fence off just about everything they can "Justify" and are working on new ways to charge me, the tax paying user, for something I already pay for.	Please see general comment responses #10 and #19
Andrew	Reich	Minerals and Energy Resources	I also urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear, cougar, and other wildlife they offer. I also would urge the BLM to protect special places from oil and gas drilling, including: The Labyrinth Canyon corridor, Desolation Canyon roadless area, including Nine Mile	Please see general comment responses #36 and #101

First Name	Last Name	Category	Comment	Response
			Canyon, Horse Bench, Maverick Canyon, upper Rock House Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches; the Price River Wilderness Unit.	
Andrew	Reich	OHV Route Identification	I urge the BLM to protect special places from the scars and other damage caused by ORVs. There should, for example, be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that need protection include: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; The Price River proposed area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment response #12 and #36
Natalie	Reid	Wilderness	Abandon the unbalanced draft plan for the 2.5 million acres managed by the BLM's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely inflict. I also urge you to protect these lands from further damage from off-road vehicle activity.	Please see general comment responses #12, #36 and #101
Mary	Renfro	Minerals and Energy Resources	In the Price RMP, please refrain from offering oil and gas leasing in wilderness areas and designate special protection for proposed wilderness lands. Preferential treatment for oil and gas leasing violates the multiple-use mandate by elevating one resource value over all others, including wilderness, riparian habitats, wildlife, cultural resources, non-motorized recreation, fisheries, visual resources, air quality, and water quality.	Please see general comment response #101
Mary	Renfro	OHV Route Identification	Please minimize motorized use in the Price RMP planning area and provide clear and effective enforcement policies to prevent motorized intrusion into non-motorized travel areas. Prohibit ORV use in wilderness study areas, BLM-inventoried wilderness lands and areas proposed for wilderness designation under the Redrock Wilderness Act. Prohibit ORV use in critical habitat and riparian areas, wetlands, and other fragile ecosystems. Provide clearly marked trails for motorized travel and enforce a strict ban on all cross-country motorized travel.	Please see general comment responses #12, #36 and #101
Tecruck	Renick	Alternative Maps	Also, the Chimney Rock, Summerville, and Humbug trail systems should be left open as on the Preferred Alternative Map.	Please see general comment responses #20 and #31
Tecruck	Renick	OHV Route Identification	The "layers" outlined in the draft plan our outrageously restrictive. Further, they are not drawn along recognizable geographic boundaries... Links should be designated to the Arapeen Trail systems. We deserve to have access to existing trails and roads! OHV use is growing - not shrinking.	See general comment responses #19, #20 and #37.
Jane	Rerecich	Minerals and Energy Resources	I have been in the O&G Industry for 24 years. As Americans, we are consuming more and more therefore the demand for these natural resources keeps increasing, while restrictions are also increasing. Many of these restrictions are merely delaying our capacity to provide energy products for all of us as energy consumers.	Please see general comment response #18
Carey	Reynolds	Wilderness	I have spent countless days in these areas hiking, camping and exploring. The gift of solitude and renewal I have found there can not be replaced once these lands are lost to development. I know that I am not the only one who has been profoundly effected by this landscape and it would be irresponsible of us as stewards of this land to desecrate it by opening it to destruction for finite resources and motorized vehicles. Think about the legacy you would want to leave behind, and perhaps you'll do what is necessary; protect our diminishing wild lands in this time of over use.	Please see general comment response #36 and #109
Cynthia	Richards	OHV Route Identification	Designate specific trails for off-road vehicles; limit the places they can be used; and regulate the hours that they can be used. Nearly 80% of the public lands managed by the Price Field office are within one mile of a motorized route. Such an imbalance makes it difficult, if not impossible, for hikers or rafters to escape the sights and sounds of ATVs, dirt bikes, and other off-road vehicles.	Please see general comment responses #12 and #19

First Name	Last Name	Category	Comment	Response
Cynthia	Richards	Process and Procedures	I believe the Castle Country Heritage Plan offers a more balanced approach that protects the land from needless oil and gas development and off-road vehicle use, while providing reasonable alternatives for these activities. I urge the BLM to adopt the Castle Country Heritage Plan.	Please see general comment response #35
Peggy	Richards	OHV Route Identification	The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use.	Please see general comment responses #19, #20 and #31
Brenda	Richardson	OHV Route Identification	The BLM should designate the entire inventory as OPEN until a travel plan can be completed.	Please see general comment responses #10 and #19
Brenda	Richardson	Recreation	No way should a Special Recreation Permit (SRP) be required for non-commercial activities.	Please see general comment response #81
Brenda	Richardson	Recreation	The BLM needs to hire an OHV specialist in order to properly manage this very popular use of public lands.	Please see general comment response #36
Ruth	Riches	Wilderness	I'm writing because of my concerns of your failure to protect our wilderness areas. Specifically areas in Southern Utah (San Rafael Swell, Desolation Canyon, Nine Mile Canyon, and Muddy Creek.)We need to preserve these places for generations to come.	Please see general comment response #109
Catherine	Ridder	OHV Route Identification	Designating every "track in the sand" as a motorized route is irresponsible and unacceptable as an approach to dealing with motorized recreation that considers non-motorized users of public lands, as well as protects sensitive areas that will be destroyed by ORV use.	Please see general comment response #19
Catherine	Ridder	Wilderness	I am writing in regard to the Price Resource Management Plan draft alternatives and want to strongly endorse the Cast County Heritage Plan! The CCHP helps protect lands included in Americas Redrock Wilderness Act from oil and gas development and from ATVs and other off road vehicles. It also includes reasonable opportunities for these activities to take place. Please protect the wilderness for future generations and do not be short-sighted by a small group of ATV/off road enthusiasts who do not represent the larger majority of Americans who do want our wilderness protected!!	Please see general comment response #36
Don	Riggle	OHV Route Identification	The Colorado 500, a 2000 member charity off road motorcycle organization, would like to submit our comments on the above BLM Plan... With the growing number of OHV vehicle sales, graying population and the increased demand for OHV recreation areas, it is imperative that the BLM provide sufficient land for this type of recreation. The C500 encourages the BLM to increase the amount of single track trails, as well as 4WD roads in the overall inventory of BLM recreation areas. The C500 and many other OHV organizations have a positive history of working with the BLM, on a volunteer basis to maintain and improve OHV recreation opportunities.	Please see general comment response #10 and #19
Randy	Riggs	Transportation and Access	I am a pilot who enjoys several backcountry airstrips in Utah with my six year old son. We like to camp and fish and hike. We live in south central Colorado and fly to backcountry airstrips in Utah 3 or 4 times a year. Most often we go to Mineral Canyon, sometimes we go to Angel Point or Needles or Happy Canyon. We hope to enjoy a lot more of them as time permits. Airplanes have less impact than some other types of use; we fly in, enjoy the area and fly out. I would like to see all back country air strips on BLM lands recognized in the RMP.	Please see general comment response #21
Peter	Rimbos	Wilderness	Specifically, I request you scrap your draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office. Of particular concern is 1.5 million acres of lands that are covered by America's Redrock Wilderness Act. These lands are clearly of wilderness quality and I request you protect them from oil and gas drilling that could cause irreversible harm.	Please see general comment response #36

First Name	Last Name	Category	Comment	Response
			I believe these public lands merit protection of their wilderness characteristics. Unfortunately, your proposed plan does not provide meaningful protection for these wildlands.	
David	Ringelberg	OHV Route Identification	The map of this route plan is a nightmare of thickly tangled roads that go into every Wilderness Study Area and UWC proposed wilderness area in the northern Price district. By designating every single track in the sand as open to motorized vehicles, BLM fails to protect cultural sites, riparian corridors, delicate desert soil, wilderness study areas, and lands within America's Redrock Wilderness. Designating every inventoried trail as a motorized route is an irresponsible and unacceptable approach to dealing with motorized recreation. The BLM needs to complete a comprehensive route designation plan within the Price Field Office that considers non-motorized users of public land, protecting sensitive areas that will be ruined by continued ORV use.	Please see general comment responses #12, #19, #31 and #32
Robert	Rinker	Minerals and Energy Resources	The plan leaves 98% of wilderness-quality lands open to drilling and actually increases the amount of land open to leasing without restrictions. Of course we have to allow oil and gas development, but I think the plan is excessive.	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Bill	Ritchie	OHV Route Identification	Existing, and long standing trails are likely to be closed to OHV use. And it is very unclear reading the proposed RMP exactly what trails will be closed and how access with OHV will be managed. It also appears there is a concerted effort to disguise these new rules and limitations through the use multiple layers of overlapping management. And in fact appears to be deceptive in areas where certain trails are supposed to be "open" but are not included on preferred alternative OHV route designation maps.	Please see general comment response #19, #31 and #37
Jenny and David	Rives	OHV Route Identification	Even though the campsites where we stay have many recreation enthusiasts, we rarely encounter another human being on any given trail. I find it hard to believe that they are 'over used'. We are very opposed to any more restrictions on off-highway vehicle areas. We hope that you will consider the vast numbers of tourists to Utah who participate in off-highway recreation, before universally excluding access to our public lands, which should remain open to the American public.	Please see general comment response #19
Ralph	Roberts	OHV Route Identification	I ask that the BLM to restrict operation of ATV's to a limited number of designated trails and to restore other damaged land to its original condition. And please enforce these restrictions	Please see general comment responses #15 and #19
Jim	Robertson	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. Please keep the Chimney Rock Summerville and Humbug trail systems open. All of the popular OHV Trail Systems must remain open. Your BLM maps must be updated to accurately detail the OHV designations outlined in each alternative. One other problem you create when you close down areas is over crowding.	Please see general comment responses #19, #20 and #31
James	Robinson	Minerals and Energy	Mineral Leasing - The areas to be leased for oil and gas should be redrawn, so no leases will be issued in the	Please see general comment responses #18 and

First Name	Last Name	Category	Comment	Response
		Resources	areas proposed in HR 1796 and S 639. In the draft RMP BLM has proposed to lease 98 percent of the lands that are not in wilderness study areas. (The draft commits to mineral leasing much land that BLM found to have wilderness characteristics, in areas Secretary Norton dropped from "wilderness inventory areas" in 2003.) All lands with wilderness characteristics should be off-limits to leasing, because they have higher public values as wilderness.	#101
James	Robinson	OHV Route Identification	ORV Routes - The network of user-created ORV routes in the Price district threatens to impair wilderness values. In the final RMP we would like to see: 1. Close all the proposed wilderness areas to off-road vehicles by classifying them as "semi-primitive non-motorized." The draft RMP closes only 400,000 acres to ORV's which is actually less than the area officially in wilderness study area status. 2. Designate routes elsewhere that do not conflict with the proposed wilderness areas, for ORV use.	Please see general comment responses #12 and #19
James	Robinson	OHV Route Identification	We want to express to you our concern about the heavy emphasis on off-road vehicles, to the detriment of wilderness and natural values. Routes should be closed to motor vehicles if they are within proposed wilderness areas in the "America's Red Rock Wilderness Act." We would like to see BLM taking better care of wilderness values in those areas.	Please see general comment responses #12 and #36
James	Robinson	Wilderness	Wilderness values - BLM has an obligation under sections 201 and 202 of the Federal Land Policy and Management Act to consider wilderness in each planning effort. Highly scenic lands in the Price RMP have been proposed for wilderness status in America's Redrock Wilderness Act (HR 1796 and S 639), a bill that is cosponsored by five members of Oregon's congressional delegation. We urge BLM not to commit any of those lands to uses that would impair their wilderness values.	Please see general comment response #36
Alan	Rogers	Minerals and Energy Resources	I urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments. The oil and gas supply which may be gained from these activities are measured in weeks and days, and don't compare with these irreplaceable wilderness lands and the crucial habitat for deer, elk, bear cougar and other wildlife they offer. I urge the BLM to protect special places from oil and gas drilling, including: The Labyrinth Canyon corridor, Desolation Canyon roadless area, including Nine Mile Canyon, Horse Bench, Maverick Canyon, upper Rock House Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches; the Price River Wilderness Unit.	Please see general comment responses #36 and #101
Alan	Rogers	OHV Route Identification	I urge the BLM to protect special places from the scars and other damage caused by ORVs. There should, for example, be no designated routes within Wilderness Study Areas and other lands within America's Redrock Wilderness Act. Other special places that need protection include: Chimney Rock, and its riparian zones and wildlife habitat; Behind the Reef, one of the best hiking zones in the Swell; The Price River proposed area, a wilderness jewel; and the San Rafael Knob, an area highly valued by hikers and other non-motorized recreationists.	Please see general comment responses #12 and #19
Alan	Rogers	Process and Procedures	I support the Castle County Heritage Plan--the citizen's alternative which offers a solid balance between natural preservation and continued development and motorized recreation.	Please see general comment response #35
James E. Rogers	Rogers	Recreation	Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping	Please see general comment response #81

First Name	Last Name	Category	Comment	Response
			and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	
Suzan	Rogers	Minerals and Energy Resources	I am writing in support of protecting BLM lands in the Price Field Office jurisdiction from oil and gas drilling.	Please see general comment response #18
Suzan	Rogers	OHV Route Identification	I am in support of restrictions on ORV use in the area.	Please see general comment responses #12 and #19
Jeffrey	Root	Minerals and Energy Resources	I've been living in Utah for less than a year now. I was amazed at the beautiful environment this state has. It seems that the people that live here do their best to keep it clean. I love sight seeing and I love the great outdoors. I'm only 22 years old so I think about the future alot. I also think about how mistakes in the past have affected the way I live today. I know that Millions of acres are at risk of being taken over by oil pumps which would somewhat damage the view of some incredibly awesome archaeological sites. I know in time this can happen because I lived in Mexico for two years. They do not preserve the past very well and their country is going to waste. That's what I love about the United States. We preserve the little we have and in the best way we can. The world grows in population all the time and we do need certain resources. Maybe spending more on alternative energy will bring out cheaper solutions to our energy problems. Eventually we're going to run out of oil so why not start on the research for something better. I plan on having children of my own one day and I wouldn't want them to miss out on what nature has to offer them. I'm an American and I support the fight to save these places.	Please see general comment responses #18 and #101
Daniel	Roper	Minerals and Energy Resources	I believe that a population growing by one million people every year deems it necessary to preserve as much open space as economically feasible. However, it is also important to consider the needs of the people and communities most affected by our policies. While oil and gas drilling provides an immediate economic boost, it is not a sustainable one, and therefore it is not worth the costs from spoiled wilderness quality lands.	Please see general comment response #18 and #101
Daniel	Roper	Wilderness	I am writing you in regards to the new management plans for the BLM lands of Utah which make the Price Resource Area. I believe that these lands are treasures of wildness, solitude, and beauty and should be managed in a manner that protects those values. I believe that your position in this issue to be very one-sided and misguided, and that misguidance seems to be originating from the White House. However, the lands managed by the BLM do not belong to any president or congressman. They are the possession of every American, and in my opinion, the majority of Americans who are concerned about the public lands in Utah want more wilderness preservation and less oil and gas drilling!... I support the Castle County Heritage Proposal!	Please see general comment responses #35, #36 and #101
Kelly	Roth	Wilderness	As a citizen who believes in the value of wilderness and the urgent need to preserve our vanishing natural areas, I would like to comment on the proposed management plan affecting the Price Unit of the BLM. The new plan should not permit oil and gas leasing in any of the areas proposed for wilderness in "America's Redrock Wilderness Act" or in those areas previously identified by the BLM as having wilderness characteristics under the '202 process'. The relatively small amount of oil and gas resources that could be extracted from this area is not worth the resulting habitat destruction and degradation of a world class natural area... the plan should not designate motorized routes within any of the proposed wilderness areas in "America's Redrock Wilderness Act". In order to preserve the integrity of this natural area, it is imperative that enforcement of ORV use in the Price Unit be increased.	Please see general comment responses #12, #36 and #101
Benjamin	Ruth	Minerals and Energy Resources	What possible sanity is there in allowing oil exploration on the public lands of the Price Resource Area in Utah's Swell, Sids Mountain, and Desolation Canyon's areas? This country's sickening and insatiable appetite for oil may lead to some outrageous activities in the Middle East, but are we also to lose what little there is of unspoiled	Please see general comment responses #18, #36 and #101

First Name	Last Name	Category	Comment	Response
			Utah too for what may amount to no more than a week's worth of US oil?	
Benjamin	Ruth	Process and Procedures	Will you heed the balanced approach advocated in the Castle Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you?	Please see general comment response #35
John	Ryan	Minerals and Energy Resources	It is apparent the energy corporations are calling the shots in the Bush administration. When it comes to saving our wilderness for our children it can't just be about profit--for once in your life how about coming down on the right side of an issue . . .	Please see general comment response #36 and #114
William	Ryan	ACEC	ACECS are supposed to be restrictive to the point that the resource to be protected is protected. The protections proposed go way beyond protection of a resource. The ACECs are written in a way that restricts other uses and have little or no benefit to the goal of the ACEC. The document seems to use an ACEC to stop oil and gas not to protect a resource.	Please see general comment response #30
William	Ryan	Minerals and Energy Resources	The mineral potential section of the document ignores the high potential for oil and gas production in the 9-mile Canyon area.	Chapter 3 of the FEIS has been revised to identify the high potential for oil and gas production in Nine Mile Canyon.
William	Ryan	Minerals and Energy Resources	NSO restrictions for oil and gas are excessive and have a very drastic effect on oil and gas activity. Directional drilling as been used in argument as a way for the oil and gas company's to access areas with NSO on them. In most cases this is not practical for three reasons, first cost, drilling cost for directional hole is 30% or more than conventional drilling. Secondly, limits on the physical ability to drill more than one to three thousand feet from the surface location. Third, geology and formation types that do not lend themselves to directional drilling. Without the inclusion of detailed information on the amount of gas and the number of wells that will not be produced or drilled the document ignores the protection and conservation of a very valuable resource that is owned by the people of the United States, a resource the people of this country expect to be protected and developed, not lost or squandered by over protection and draconian restrictions. Until the document reports accurately the impact to a protected resource (OIl and Gas) the document is technically and procedurally incomplete.	The NSO category is applied only when necessary to protect other resources. Directional drilling is considered where possible and is one of many mitigation measures used in the planning area. However, directional drilling is not always possible given geology and certain technical issues. The lessee (operator) in consultation with BLM ultimately decides the method of drilling. Also see general comment response #16.
William	Ryan	Socioeconomics	The Socio-economic section is extremely limited on information on oil and gas value to the local and state economy. Please refer to the economic studies conducted in the Uintah Basin for additional details. Until the referenced sections are addressed and redrafted the document is technically and procedurally incomplete.	See general comment responses #132 and #133. The Proposed RMP/Final EIS provides additional information on data sources and assumptions regarding the analysis of socioeconomic impacts of oil and gas production with the Price Field Office. The analysis considered the various studies that evaluated the economic contribution of this industry to local communities. This includes the study conducted in the Uintah basin. Further details are provided in Chapter 4, Section 4.6.
Gloria	Sage	Wilderness	The Castle Country Heritage Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act. None of the alternatives described in the draft Price RMP adequately do so. The damage already done by off-road vehicles is awesome. Allowing companies to lease, explore for oil and gas, and ultimately develop these lands, will ruin the scenery of this incredibly beautiful and unique area, as well as causes soil erosion, effect water quality, endangers wildlife habitat, and destroys rare plants.	Please see general comment responses #35 and #36

First Name	Last Name	Category	Comment	Response
			Such unique and beautiful areas must be protected the sake of all Americans and for future generations.	
Randy	Sailer	Process and Procedures	I am writing about the Price resource management plan which I oppose and endorse the Castle Country Heritage Plan. This plan is far more balanced and in line with the wishes of the American people. In closing, The Draft Price RMP sucks. Thank you.	Please see general comment responses #35 and #36
Randy	Sailer	Process and Procedures	I am writing in support of the Castle Country Heritage Plan in the Price Resource Management Plan draft alternatives. Balance backed by sound science is the smart way to manage our public lands.	Please see general comment response #35
Stacy	Salmans	OHV Route Identification	We are losing far too much public land to special interest groups. We could go on the attack and find faults with all of them. We need to leave open spaces for everyone to recreate in and Open Access to ALL, in all areas. I want to be able to take my aging father into some of these areas and let him see the wonderful and beautiful scenery. He is unable to hike a great distance any longer and without access for him in a vehicle he will never be able to see these areas you are considering for limited access and no access. I feel it would be a shame to shut people out with disabilities and aging bodies. Being a member of the Utah 4 Wheel Drive Association, I know of many efforts by the association to promote ethical and proper use of the land. I am a member of Fly Fisher Federation, NRA , all of which are avid supporters of proper use of land and the environment. We put many tax dollars and contributions into the system to help out the environment. Land use should be given to ALL.	Please see general comment responses #10, #19 and #80
Bruce	Sanchez	OHV Route Identification	No more ORV "open areas": No further designation of ORV trails within lands designated in the Redrock Wilderness Act or existing wilderness study areas such as Sids Mountain	Please see general comment responses #12 and #36
Bruce	Sanchez	Wilderness	It is critical that we protect Utah wilderness, and particularly those within America's Redrock Wilderness Act.	Please see general comment response #36
Laura	Sanders	OHV Route Identification	Designating many reclaimed mining routes would allow so many people to travel these otherwise quiet and safe roads in large and fast vehicles. This designation will allow much disturbance into ALL areas. Please be sure you and the BLM have completed a very thorough route plan that considers the impact of these motor vehicles in wilderness areas. I believe there are many areas open to motor vehicles and I would like to see wilderness areas used only by humans and animals.	Please see general comment responses #12 and #36
Richard and Kathleen	Sanders	Process and Procedures	The Castle Country Heritage Plan would be a tremendous step in the right direction. We urge that you incorporate the ideas embodied in that plan into the BLM management of our lands. Many people have rights to use public lands, but no one has the right to destroy them.	Please see general comment response #35
Richard	Sassaman	Wilderness	Your draft does not consider the 'public' at all, but favors a few special interests. It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing .	Please see general comment responses #36 and #101.
Ron	Sawdey	Minerals and Energy Resources	The impact of oil and gas exploration and development is harmful in many ways to these pristine lands and is not worth the 4 days worth of oil and 4 weeks worth of natural gas that could potentially be extracted from these lands (USGS estimates). Oil and gas exploration and development should not be allowed in all lands described in America's Redrock Wilderness Act.	Please see general comment responses #36 and #101
Ron	Sawdey	OHV Route Identification	The current proposals leave far too much wilderness quality land open to ORV's; nearly 80% of all public lands managed by your Field Office are within 1 mile of a motorized route. This imbalance makes it difficult for human powered recreationists to escape the noise and visual impact of these mechanized toys. The environmental and social impacts of ORV's must be more carefully controlled. Specifically, I recommend that no "open areas" be	Please see general comment responses #12 and #36

First Name	Last Name	Category	Comment	Response
			designated for ORV use, and that no trails should be designated within the lands described in America's Redrock Wilderness Act.	
Ron	Sawdey	Process and Procedures	I am writing to comment on the Price Resource Management Plan and to endorse the Castle Country Heritage Plan. I believe this is a balanced approach to land use management for this area, and that it protects wilderness quality lands from degradation due to oil and gas development as well as ORV overuse. I urge you to consider alternatives that will protect lands included in America's Redrock Wilderness Act from despoliation.	Please see general comment responses #12, #35 and #36
Peter	Scanlan	OHV Route Identification	BLM needs to establish a balance between motorized and non-motorized travel; including an effective trail enforcement plan; restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act; and restrict ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	Please see general comment responses #12 and #36
Peter	Scanlan	Wilderness	The BLM's plan should be revised to more effectively protect proposed wilderness and more equitably assess the value of the varied uses of public lands, including non-destructive recreational uses.	Please see general comment response #36 and #109
Kjerstin	Schick	Wilderness	If the wilderness areas are used for oil, natural gas, and other for profit businesses, some of our most beautiful, pristine, and unique lands will be forever destroyed for the one time profit of some business men.	Please see general comment response #109
Christopher	Schmidt	Minerals and Energy Resources	I urge you to stop issuing oil and gas drilling permits on BLM land. Looking forward 100 years, those commodities will only increase in value, and it is ridiculous to use them now, when there are so many reserves in private hands that can be tapped whenever economics dictate.	Please see general comment response #18
Stephen	Scholle	Transportation and Access	I urge you to contain development practices that lower the quality of the natural landscape. While I appreciate the need for current automobile access to much of this desolate territory, I urge you to restrict ATV and dirt bike activity as well as mining and road building.	Please see general comment responses #10 and #19
Galen	Schuck	Livestock Grazing	I urge you to step up and protect out last wild places from ... cattle.	Please see general comment response #33
Galen	Schuck	OHV Route Identification	I urge you to step up and protect out last wild places from . . . off road vehicles.	Please see general comment responses #12 and #19
Charles	Schulz	Minerals and Energy Resources	America's Redrock Wilderness Act areas have to be protected from oil and gas development. The development of these lands for such a small bit of oil and/or gas will lead to the destruction of incomparable wilderness areas.	Please see general comment responses #36 and #101
Charles	Schulz	OHV Route Identification	Likewise, ORV use within this area or other wilderness study areas can result in the areas being forever damaged and unfit for inclusion in the wilderness areas currently under study. Not allowing the studies to be completed before making irreparable decisions is not good wilderness maintenance practice	Please see general comment response #12
Christopher	Scott	Minerals and Energy Resources	Please protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon.	These areas would be protected under Alternative E. See general comment response #36.
Christopher	Scott	OHV Route Identification	Such "bad vision" is also the case in the decision to designate specific trails for ORVs- motorized trails would remain on more than 2 million acres. I've seen all too often the horrible carnage of the desert left by these machines and there often insensitive, arrogant and abusive operators, not to mention their ruining of peace and any wilderness experience.	Please see general comment responses #12, #19, and #36
Christopher	Scott	Wilderness	The BLMs revised management plan for the area is unacceptable-it leaves 98 percent of wilderness-quality lands open to drilling and increases by nearly 20 percent the amount of land open to leasing without restrictions.	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities

First Name	Last Name	Category	Comment	Response
				are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Scott	Seibold	OHV Route Identification	I would like to put on record my opposition to the current plan which does not address many known OHV routes and airstrips known to exist, which have been submitted to the BLM early in this process.	See general comment responses #19, #20, #21 and #31
Scott	Seibold	OHV Route Identification	Please include the Chimney Rock/Summerville Trail System and the Arapeen Trail connector routes.	Please see general comment responses #20 and #31
Scott	Seibold	Transportation and Access	I urge the BLM to reconsider its current draft and include these known OHV routes and airstrips, specifically, so they may continue to be used by the general public for recreational use, as they have been for decades.	Please see general comment responses #20, #21 and #31
Scott	Seibold	Transportation and Access	Please include the following airstrips; Horseshoe Canyon, Stone Cabin Gas Field, Sagebrush Bench, Cliff Dweller Flat, Gruvers Mesa, Sweetwater Reef, Temple Wash.	Please see general comment response #21
Larry, Pam, Scott, Will and Ra	Seitter	OHV Route Identification	This new management plan appears to close significant amounts of established roads and trails. Please do not leave out established OHV trails on the OHV Route Designation Maps. I am referring to one of our favorites, the Chimney Rock/Summerville Trail system.	Please see general comment responses #19, #20 and #31
Heather	Selin	Minerals and Energy Resources	The plan would sacrifice a beautiful area that is home to unique wildlife and that is enjoyed by visitors, to drilling for natural resources that, by the US Geological Survey's estimate, would produce just 4 days' worth of oil and 4 weeks' worth of natural gas. There is a great imbalance here.	Please see general comment responses #18 and #101
Jean	Semborski	Minerals and Energy Resources	We propose that mitigation payments be explicitly allowed as a permissible alternative under the mitigation requirements of Appendix 8 and Appendix 16... We propose that off-site mitigation be an explicit requirement to offset high-value habitat impacts from oil and gas development. We further propose that off-site mitigation be an explicit strategy for exception, modification, and waiver processes... We propose that use of work over rigs, mobile pumps and tanks, excavation equipment, road grading equipment, snow plowing equipment, cranes and other equipment for needed operation and maintenance activities for existing oil and gas facilities including wells, well sites, roads, pipelines, compressor stations, gas treating stations, etc. be explicitly allowed by the RMP during seasonal closures... We propose that the current practice of a 3 year monitoring period be continued, rather than imposing a new 7 year monitoring period... We believe that current management practices (survey of nesting habitat and management around active nest sites) is the best management practice and that general restrictions of an entire class of habitat is not necessary. We propose that the raptor cliff nesting complex management proposal be eliminated because it is redundant... The requirements for known raptor nest sites in Appendix 8 need clarification... We propose that controlled surface use and timing limitations be used, rather than NSO, on oil and gas development within .5mile of known nest sites... We propose that the exception process specifically allow wells less than .5mile from nests, taking into account the local topography, and given appropriate mitigation and approvals... please correct any discrepancy that may exist... propose that stipulations for "substantial" and "limited" value winter range in Appendix 8 be eliminated... The meaning of these two entries is unclear. We recommend that one entry be eliminated... request that the fawning and calving areas be depicted on a map so that the extent of NSO may be assessed... propose that controlled surface use and timing limitations	See general comment responses #41 and #43. Utah Riparian Management Policy states, “No surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown that (1) there are no practical alternatives, or, (2) all long term impacts can be fully mitigated, or, (3) the activity will benefit and enhance the riparian area.” Further, State and federal law (specifically the Clean Water Act as administered in Utah by the Division of Water Quality and 43 CFR 4180 which addresses watershed and rangeland health) protects water quality within the State of Utah and the waters leaving the State. Executive order 11990 protects wetlands from development and Executive order 11988 restricts development within the 100 year floodplain. The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, reducing erosion, stream

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			be used, rather than NSO, on oil and gas development within these areas... we request that nesting/rearing areas be subject to controlled surface use according to best management practices, rather than to timing limitations or NSO.. request that land use restrictions not be imposed on unoccupied habitat.. under sage grouse in the table, the surface use restriction specifies, 'impossible'. this should be corrected.. recommend that the period of seasonal restriction be clearly defined.. provide a map showing the breeding habitat for these birds.. recommend changing Alt D to special stipulation. further propose that stipulations be applied only very sparingly, to critical breeding habitat containing significant numbers of actual nesting birds, rather than to large areas of potential breeding habitat... these appear to conflict with one another. suggest that one be removed... suggest that the white-tailed prairie dog colony issue be handled under best management practice developed as a uniform plan across the resource area... propose that the RMP should allow for development of best management practices, and that the RMP specify that these best management practices be developed in concert with industry, other participating agencies, and other key stakeholders... in appendix 8, we propose replacing no surface occupancy (alt d) with seasonal closure of white-tailed prairie dog colony areas (alt a, b, and c) to make the requirements to the proposed action consistent with the best use/multiple use objective of alt d.. two separate entries for pronghorn crucial fawning habitat occur in app. 8. since they appear to conflict we recommend that one be removed.. suggest that this habitat be shown so that the extent of the No Surface Occupancy impact to oil and gas development can be evaluated.. propose that the RMP should direct that seasonal restrictions or other best management practices be adopted to protect bighorn habitat, rather than NSO.. recommend that alt D in app. 8 be revised to reflect the assessment of the EIS.. app 8 alt D under Riparian Wetland and Fisheries is inconsistent with this and should be modified to eliminate intermittent drainages.. under the exception, modification, and waiver process description for buffer zones for springs and perennial streams, the modification process is simply listed as 'spatial'. this should be explained more fully.. propose that the RMP should set an expectation and schedule to develop best management practices for surface occupancy near springs and perennial streams to address the numerous factors which influence the impact of such occupancy. The RMP should specify that these management plans be developed in concert with industry, other participating agencies, and other key stakeholders.. propose that stream crossings built according to best management practices, with offsite mitigation of equivalent value, be explicitly allowed in app 16.. for management purposes, maps should be included to clearly indicate which streams are considered intermittent, and which are considered perennial.. clarify that maintenance or restoration of the water table in wetland and riparian areas would not include revocation or restriction of existing water rights.. PFO RMP should specify the measures necessary to demonstrate mitigation. The RMP should also state that exceptions will be considered for all activities including Minerals and Energy development.. propose that the RMP should set an expectation and schedule to develop a best management practices to preserve the environmental values of these ACEC's, while still allowing surface occupancy and oil and gas development. The RMP should specify that these management plans be developed in concert with industry, other participating agencies, and other key stakeholders.. propose that BLM and Utah DWR assess the manpower needs to administer this RMP without costly delays to project proponents and existing operators, and include those in a discussion of their staffing plans in the RMP.. Please reference the best management practices used on slopes >20% for survey and design parameters.. The EIS refers to proper erosion control requirements. Please give a reference for this information.. The EIS refers to GIS modeling. Please specify what type of GIS modeling is required for the plant.. Our interpretation is that our lease roads, well sites and rights-of-way are included in 'designated roads and trails' and that we would have rights, under existing and future leases, to use the surface for operational and maintenance requirements. Please specify in the RMP that this use is allowed.. Please make clear in the RMP that more than 72 wells per year could be drilled in some years. Also, please	sedimentation and salinization. Water resources would also be protected in community watershed and sources of culinary water. Decisions in the RMP concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition. The State Engineer for the State of Utah is the authority concerning all water rights decisions within the state of Utah. BLM has management authority for the control of water rights granted to BLM only and certain Public water reserves. All projects affecting land are subject to NEPA review and public comment. NEPA requires disclosure of all foreseeable effects to the human environment concerning all these actions.

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Jean	Semborski	Wildlife and Fish	We propose that mitigation payments be explicitly allowed as a permissible alternative under the mitigation requirements of Appendix 8 and Appendix 16... We propose that off-site mitigation be an explicit requirement to offset high-value habitat impacts from oil and gas development. We further propose that off-site mitigation be an explicit strategy for exception, modification, and waiver processes... We propose that use of workover rigs, mobile pumps and tanks, excavation equipment, road grading equipment, snow plowing equipment, cranes and other equipment for needed operation and maintenance activities for existing oil and gas facilities including wells, wellsites, roads, pipelines, compressor stations, gas treating stations, etc. be explicitly allowed by the RMP during seasonal closures... We propose that the current practice of a 3 year monitoring period be continued, rather than imposing a new 7 year monitoring period... We believe that current management practices (survey of nesting habitat and management around active nest sites) is the best management practice, and that general restrictions of an entire class of habitat is not necessary. We propose that the raptor cliff nesting complex management proposal be eliminated because it is redundant... The requirements for known raptor nest sites in Appendix 8 need clarification... We propose that controlled surface use and timing limitations be used, rather than NSO, on oil and gas development within .5mile of known nest sites... We propose that the exception process specifically allow wells less than .5mile from nests, taking into account the local topography, and given appropriate mitigation and approvals... please correct any discrepancy that may exist... propose that stipulations for "substantial" and "limited" value winter range in Appendix 8 be eliminated... The meaning of these two entries is unclear. We recommend that one entry be eliminated... request that the fawning and calving areas be depicted on a map so that the extent of NSO may be assessed... propose that controlled surface use and timing limitations be used, rather than NSO, on oil and gas development within these areas... we request that nesting/rearing areas be subject to controlled surface use according to best management practices, rather than to timing limitations or NSO.. request that land use restrictions not be imposed on unoccupied habitat.. under sage grouse in the table, the surface use restriction specifies, 'impossible'. this should be corrected.. recommend that the period of seasonal restriction be clearly defined.. provide a map showing the breeding habitat for these birds.. recommend changing Alt D to special stipulation. further propose that stipulations be applied only very sparingly, to critical breeding habitat containing significant numbers of actual nesting birds, rather than to large areas of potential breeding habitat... these appear to conflict with one another. suggest that one be removed... suggest that the white-tailed prairie dog colony issue be handled under best management practice developed as a uniform plan across the resource area... propose that the RMP should allow for development of best management practices, and that the RMP specify that these best management practices be developed in concert with industry, other	Please see general comment responses #41 and #43. Utah Riparian Management Policy states, “No surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown that (1) there are no practical alternatives, or, (2) all long term impacts can be fully mitigated, or, (3) the activity will benefit and enhance the riparian area.” Further, State and federal law (specifically the Clean Water Act as administered in Utah by the Division of Water Quality and 43 CFR 4180 which addresses watershed and rangeland health) protects water quality within the State of Utah and the waters leaving the State. Executive order 11990 protects wetlands from development and Executive order 11988 restricts development within the 100 year floodplain. The decisions common to all alternatives show that water resources would be protected by maintaining or restoring overall watershed health, reducing erosion, stream sedimentation and salinization. Water resources would also be protected in community watershed and sources of culinary water. Decisions in the RMP concentrate on maintaining or restoring the chemical, physical and biological integrity of the area's water. The riparian areas would be maintained, protected or restored to a proper functioning condition. The State Engineer for the State of Utah is the authority concerning all water rights decisions

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Betsy and David	Shade	Minerals and Energy Resources	All proposed wilderness should be closed to leasing.	Please see general comment response #101
Betsy and David	Shade	OHV Route Identification	In the final plan, please close all proposed wilderness areas to ORV traffic.	Please see general comment responses #12 and #36
Betsy and David	Shade	Wilderness	The proposed wilderness areas in America's Redrock Wilderness Act have not been protected by the draft plan.	Please see general comment response #36
John	Shanahan	Minerals and Energy Resources	I, like all Americans, am an energy user. I understand our need for oil and gas. Future generations will judge us as to how well we balance our current energy needs with our need to preserve and protect our public lands. This begs the question: Is it necessary to allow spoliation of the lands under your jurisdiction to meet our nation's energy needs, or is the profit of the oil and gas industry or another fiscal cause the motivation for opening such lands to development?	Please see general comment responses #18, #36 and #101
Marlin	Sharp	Transportation and Access	I am writing to comment on the proposed Revised Resource Management Plan. Our family is avid OHV fans and we belong to a Jeep club in Utah Valley. We are also very responsible in enjoying the beauty that Utah has to offer on our public lands. We constantly teach responsible trail riding by staying on the roads and trails. We want the lands we visit to remain pristine as it has in the past. But closing areas are not the answer. It would be the same as closing the freeway because people throw trash out the window. It doesn't make sense.	Please see general comment response #10
David	Shaver	Special Status Species	Prior to implementing this plan BLM should prepare a detailed set of maps specifically showing the exact location of those areas presently (and potentially) affected by all of the various special-status species designations. These maps should be subject to public review, comment and appeal.	Please see general comment response #63
Marty	Shelp	Recreation	I am writing to you in regards to changes and motor use restrictions proposed for the management plan for Desolation/Gray Canyons. I first must say I was angered for not being informed of and given an opportunity for my input on any management/use changes. I thought these policies were a public process and I have paid high use fees for several seasons to enjoy this stretch of river and could have easily been contacted to offer input. I would hope user input would be important to the management process. I have been able to do many trips through Deso and certainly want to protect the beauty and natural qualities that make this trip so unique. I don't know what other changes are being proposed but must ask you to consider my views on the motor use restrictions that are being suggested/considered... I feel I could continue my arguments for acceptable use on motors in your area and will be glad to if you want more input. I am very much upset about all the changes being made in many agencies without adequate feedback from its users, who are the ones that finance the agencies to begin with. I wonder if there are other changes being proposed that I am unaware of. Are all these issues a secret? Who is controlling what and why are these changes necessary? Perhaps education and responsible use would nullify the need for any management changes. I think your fees are high but the current plan seems to be keeping the canyon in good shape. Please read my letter or bring my points to discussion to whatever process you have when making changes to your current plans. Motors being used in Deso/Gray canyons should be acceptable and not changed... P.S. What is being done about all the effects of the oil and gas wells and the truck use, pipelines, spills, and disturbed habitats that seem to be increasing each year? These seem much more of a threat to the environment than motor use on the river.	Please see general comment response #34
Marty	Shelp	Recreation	The use of motors is needed for equitable use of the area and shorter trip requirements. What is the larger impact on the canyon a 4 or 5 day trip using a motor or a 8 or 9 day trip of camping at multiple sites affecting the	Please see general comment response #34

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			beaches, vegetation, and fragile riparian wilderness? What is the harmful impact of motors on the canyon anyway? This has never been explained. Doesn't all the water come out of Flaming Gorge where there is common use of motors. Has this practice also endangered Brown's Park and Dinosaur Monument? Have there been studies on the environmental impacts of motors in Deso/Gray? Where are they and what did they reveal? Are the new 4-stroke motors really that much better than the newer 2-strokes? Where's the data that shows all the advances of technologies with these types of engines? I read that there were some 2-strokes now being tested that had better emission standards than the 4-strokes. I think it is unwise to make a requirement for 4-strokes especially if other motors are being improved every year. I also see the need for motor use for trip logistics and first aid emergencies... The use of motors allows for groups to spread out better and keep agendas. What if there was a first aid emergency? I certainly don't want to rely on outside help for any emergencies; after all I like to be self reliant to give myself that true wilderness adventure feeling. However, in an area as remote as Desolation Canyon, I like to know I can motor out if there is an emergency situation. Prohibiting motor use could endanger an accident victim especially at low water levels. I have done several water quality tests in Colorado, with the Colorado Division of Wildlife, and was amazed at the reduced amounts of toxic elements in the river water during run-off. This is due to the large dilution factor. Why would motors be banned during high water when the affect of their emissions would be so much reduced at flows over 5000 cfs? The logic makes no sense. If 90 motored trips are allowed each year will this be allocated between both commercials and privates? How will they be decided? What if it is a very low water year? Why make a requirement that will be so difficult to allocate equitable use?	
Ronald	Shelp	Recreation	Adventure Bound Management and staff are strongly against the preferred alternate "D" concerning the limited motorized use in Desolation/Gray Canyons... The limit of 4 stroke motors in the Canyon is very short sighted. There are electric outfitters use 4-stroke motors when there a re MORE environmentally sound alternatives available. The current 2 stroke motors, when used and tuned properly, and when using synthetic oils are very environmentally friendly and should be allowed to be used for the duration of their usefulness.. The limit of 90 motor trips a year is very open ended with too many questions left unanswered. Who will get these special permits? If we have extremely low water levels during a season will exceptions be made?	Please see general comment response #34
Eric	Sherrill	Wild and Scenic Rivers	I am very concerned about washes being designated as "wild and scenic rivers". An example of this is Coal Wash. There has been a road or a jeep trail through it for as long as anyone can remember, but if you so designate it then that will end. I feel that when you do this, you are taking away from the true character of the area. We enjoy the beauty of this land, and we want to protect it as much as anyone, but to really enjoy it you need to be able to access it. How can a wash that runs once or twice a year be considered a river? Isn't that as bad as declaring an area that has had a road through it for 100 years a wilderness area?	Please see general comment response #88
Eric	Sherrill	Wilderness	As a pilot I can tell you that all of the WSA's have roads through them. I feel that they should be illegal anyway. Can you enforce a pre-facto law? Can you close an abortion clinic because Congress has a bill pending that makes the practice illegal when the Clinics (roads) are all ready there?	Please see general comment responses #22 and #108
Matthew	Shipp	Wilderness	It has come to my attention that many acres of our wilderness are being debated upon how they should be used. I was alarmed to hear that some of the land is being considered for use by oil and gas development. I plead with you to protect citizen proposed wilderness areas. Please do not offer proposed wilderness lands to oil companies. Instead preserve our special places now	Please see general comment responses #36, #101 and #109

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			proposed for wilderness designation from oil and gas development to make sure these natural wonders are not destroyed.	
Brenda	Short	OHV Route Identification	We have tried to experience some areas, only to be turned back by closed signs. For example, we tried to ride to Swasey's Leap but the trail was closed. We found out later that it was a short hike past the closed fence, but as my husband is disabled it would not have been possible for him to go there. How unfortunate! We hope that this and other areas will be opened up so they can be experienced by all. I think it is possible for the trails in this area to be open to all recreational users.	Please see general comment responses #10 and #80
David	Short	Transportation and Access	Any route closures would essentially ban me from that area. have already been banned from visiting many areas including Swasey's Leap, Mexican Bend, Stinking Spring, Junes Bottom, Chute Canyon, ZCMI mine, and the Falls (Eagle Canyon.) I have never seen anyone hiking in these closed areas, only other frustrated seniors (on ATVs) banned by the closures. I feel these closures were unnecessary. I would encourage you to work with the local clubs in developing the trail systems and opening areas that have been closed in recent years. I feel the signs placed recently explaining the importance of staying on the trails have been very effective. I have seen no indications of ATVers abusing the privilege this past year.	Please see general comment responses #10 and #80
Robert	Shroy	Minerals and Energy Resources	Also, oil and gas leasing and wells should not be allowed in areas covered by the Red Rock Wilderness Act. Such activity is just not compatible with the land's designated classifications.	Please see general comment responses #36 and #101
Robert	Shroy	OHV Route Identification	I am writing to comment on draft alternative of the Price Resource Management Plan. I urge that off road vehicles should be kept on designated trails and there should not be open areas that don't have limitation on off road activity. And there should be no off road vehicles as all in wilderness study areas.	Please see general comment responses #12 and #36
Caroline	Shugart	Minerals and Energy Resources	Please protect the last of our wilderness lands from oil companies... I urge you to protect all Utah wilderness areas from oil companies and from development.	Please see general comment responses #36 and #101
Caroline	Shugart	OHV Route Identification	Please help develop a plan that would clearly specify where these ORVs could be used without effecting fragile areas. Please have a plan that is enforced. Please protect trails and hikers from having to share space with these ORVs. Please have these trails clearly mapped and signed.	Please see general comment responses #15 and #19
Edie	Sidle	Minerals and Energy Resources	Please also prohibit oil and gas leasing/drilling in the wilderness areas.	Please see general comment responses #36 and #101
Edie	Sidle	OHV Route Identification	Please restrict vehicles to designated roads and trails	Please see general comment response #19
J. B.	Siegwald	Process and Procedures	The currently proposed RMP is an inaccurate interpretation of the BLM's own "multiple use" mandate. Please revise the plan to provide a more balanced use of this critical ecological area.	Please see general comment response #1
Glenna	Siggard	Minerals and Energy Resources	Please do not drill any more on our land .	Please see general comment response #18
Glenna	Siggard	OHV Route Identification	Off road vehicles are destroying the earth; make them stay on the trails and educate them	Please see general comment response #19
Rodney	Silliman	Wild and Scenic Rivers	I am pleased to find that in alternative D you have shown the wisdom of keeping the Green River unrestricted from the RR bridge to Ruby Ranch. I hope you continue to allow the private property owners along the river to develop and otherwise enjoy their property. I also ask you to drop the clause in Alternative D about revisiting this	Private lands are not affected by the managing a river as Wild and Scenic. Likewise, Congressional designation of a river under the Wild and Scenic

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			decision at later date.	Rivers Act neither gives nor implies government control of private lands within the river corridor. Although Congress could include private lands within the boundaries of the designated river area, management restrictions would apply only to public lands. Private land owners would be able to use their property as they had before designation. There is no reference under W&SR to revisiting a decision.
Valerie	Silver	Process and Procedures	America's Redrock Wilderness must be preserved and protected for its own intrinsic value as well as for the (non-motorized) recreational use of human generations that will follow ours. I oppose the Price Resource Management plan as it fails to protect --or even treat with care-- the surrounding wilderness quality lands. As I read it, the proposal lacks balance and adequate land use planning. It heavily favors drilling and development by the oil and gas and off-road industries. I oppose the opening of BLM lands for this type of exploitation and short-term financial gain for a handful of interests at the expense of the public good. I urge you to present a more balanced plan to the American public. Please protect America's Redrock wilderness.	Please see general comment responses #12, #36 and #101
Troy	Simpson	OHV Route Identification	I am strongly urging you to continue allowing access to the mining & access' roads, (those currently being used). As an ATV rider, I've found that time spent exploring our beautiful state on my ATV has been some of my most treasured experiences. My family became active on ATVs when my son became a pre-teen. It's been a great family activity – a safe, fun way to spend time together.	Please see general comment responses #10 #19
Troy	Simpson	OHV Route Identification	Had we not be able to access the already constructed roads, we would not have enjoyed these many, many pleasant weekends together. Please, I urge you, keep the existing roads, (mining, access or other), open. The land should have multiple uses, not restricted to those who are able, (and in the case of my teenager-willing), to hike the many miles up into these areas.	See general comment responses#10, #19 and #80.
Diane	Sklensky	Process and Procedures	The Price Resource Management Plan draft alternatives fail to protect America's Redrock Wilderness! This stark and fabulous landscape belongs to all Americans, past, present and future, and destroying it for the sake of our unsustainable addiction to oil and gas (which is also damaging our atmosphere, possibly irreversibly), is an appalling dereliction of your responsibility to manage the land. I realize that there is little incentive to protect our nation's landscapes in this current legislative climate, but officials have a responsibility that outweighs politics. The Bureau of Land Management must work for the long-term, and realize that resource extraction is a destructive and, frequently, irreversible use that threatens wildlife and recreational opportunities that can co-exist, benefiting Americans indefinitely. By not even considering whether any of the remote and untrammeled landscapes deserved permanent protection from oil and gas development, the BLM has done itself, and America a disservice. Please consider, instead, the Castle Country Heritage Plan; a reasonable, well-balanced plan that should be adopted by the Bureau of Land Management for the benefit of the land and all of America's citizens.	Please see general comment response #36
Cap	Smith	Alternative Maps	BLM states the Chimney Rock/Summerville Trail system will be designated open, but does not include this popular OHV trail system on the Preferred Alternative OHV Route Designation Map. This is deceptive. The OHV	Please see general comment responses #20 and

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			community deserves to be treated with respect. The BLM maps should be updated to accurately portray the OHV designations outlined in each alternative.	#31
Cap	Smith	OHV Route Identification	I urge the BLM to accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan. There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands.	Please see general comment responses #19 and #81
David	Smith	Recreation	Protect my ability for good fishing. I want to stress that water supply and quality maintained and access to those places.	Water quality standards are set by the State of Utah through the Department of Environmental Quality, Division of Water Quality(DEQ-DWQ) with oversight from EPA. BLM policy is to meet these standards for protecting water quality and provide healthy riparian habitat. BLM incorporates Best Management Practices for reducing erosion and protecting water resources in its land management activities and also works to maintain healthy vegetation and soil conditions, which in turn help in the retention and filtering of sediments and salts, minimizing impacts to water quality.
Doug	Smith	Transportation and Access	I understand that the draft plan includes over 3000 miles of motorized routes, near and crossing wilderness study areas. Please note my statement in protest of more roads than those absolutely necessary to accommodate important oil and gas development.	Please see general comment response #10
Gibbs and Catherine	Smith	OHV Route Identification	Places dedicated to destruction from OHV should be clearly marked and all other places be totally off limits. The environmental impacts that will result should be included in the environmental impact statement.	Please see general comment responses #15 and #19
Gibbs and Catherine	Smith	Process and Procedures	We strongly support the Castle Country Heritage Plan, because it has been carefully thought out and includes opportunities for extractive activities and off-road activity in specified locations (both of which effectively trash whatever land they touch) while protecting lands included in America's Redrock Wilderness Act. It is an alternative that goes beyond the Price draft RMP to attempt to provide solutions for more than one side of the situation.	Please see general comment responses #35 and #36
J.C.	Smith	Wilderness	As citizens, we think all areas proposed for wilderness in America's Redrock Wilderness Act should be closed to all ORVs and oil and gas leasing. In fact, we think roads and oil and gas leasing should be kept out of all Wilderness Study Areas as well as Wilderness Area.	Please see general comment responses #36 and #101
Thos. H.	Smith	Minerals and Energy Resources	I also prefer to exclude the noise and pollution of mineral exploration or production. I feel there are plenty of opportunities within the US for these activities and it is reasonable for some areas to be set aside for "quiet" activities.	Please see general comment responses #18 and #36
Thos. H.	Smith	Process and Procedures	Although not 100% familiar with the Castle Country Heritage Plan I feel it is a balanced approach that protects lands included in the Redrock Wilderness area from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes some opportunities for these activities.	Please see general comment responses #35 and #36
Todd	Smith	Minerals and Energy Resources	The BLM should analyze management alternatives for wilderness characteristics in its RMP revision.	Please see general comment response #36
Todd	Smith	Wilderness	The BLM should analyze management alternatives for wilderness characteristics in its RMP revision.	Please see general comment responses #36 and

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				#109
Wendy	Smith	Cultural Resources	To allow ORV's in Wilderness areas is an unconscionable offense to the intent of Wilderness designation, to the habitat values, and to the archeological sites which are irreplaceable. A habitat can recover. Once an archeological site has been destroyed by ORV's or defaced by people who don't understand their value it is lost to the world forever.	Please see general comment response #9
Wendy	Smith	Wilderness	As I understand it your mandate, as our agent in charge of upholding the tenets of the Wilderness Act, is to protect these lands as intended in the Wilderness designation and proposed Wilderness designation. I ask you now to fulfill your duty and not bow to the pressure of the local counties or those in Washington who have interests in the ORV industry or the oil and gas industries who are pressuring the opening of these lands to exploration for something that will not fix an energy crisis that can be alleviated in other ways rather than destroying our precious Wilderness lands.	Please see general comment responses #12, #36, #101 and #120
Reg	Solomon	OHV Route Identification	We write to lend our voices in opposition to the proposal to designate almost every reclaimed mining route, two-track and wide cow path in the Northern half of the Price BLM field office area as open to motor vehicles. Wilderness areas should have no such motorized access. Conduct a thorough and proper study before implementing this ill-advised ORV policy and simply surrendering to the ORV lobby. Please rethink implementation of this short-sighted and disastrous policy. Maintain the integrity of these amazing landscapes. Act conscientiously and responsibly.	Please see general comment response #19
Reg	Solomon	OHV Route Identification	Conduct a thorough and proper study before implementing this ill-advised ORV policy and simply surrendering to the ORV lobby. Please rethink implementation of this short-sighted and disastrous policy. Maintain the integrity of these amazing landscapes. Act conscientiously and responsibly.	Please see general comment response #19
Jerry	Somers	OHV Route Identification	I think increased patrol, education and signs at trail heads would help with the problems. I encourage you to meet the needs of all which use the land.	Enforcement, signing etc. will be part of a travel management plan that will be developed to implement the RMP. These actions are dependent on available funding and are beyond the scope of the Proposed RMP/Final EIS. See general comment response #15.
Ilya	Sone	OHV Route Identification	The BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment responses #19 and #20
Ilya	Sone	OHV Route Identification	The OHV community has experienced extreme land closures in recent years. Many areas we were once allowed to ride are now claimed as Wilderness. We are at the point where we simply cannot give any more land up. The answer does not lie in closing more land to us and shoving us into smaller and smaller places. Public lands outside of parks and wilderness areas should not include the same rules. Motorized recreation is a valid from of recreation. My main concerns regarding the DRMP/DEIS are as follows: -There is no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands... -How many miles of OHV routes on Map 2-56 are currently ILLEGAL for unlicensed OHV use? - The recreating public will not tolerate overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I adamantly oppose all the management 'layers' outlined in the draft plan. -Popular OHV Trail Systems must remain open. Millions and millions of acres throughout the western states have already been taken from the OHV community in recent years and locked up as Wilderness.	Please see general comment responses #37 and #81

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Ilya	Sone	OHV Route Identification	The BLM maps must be updated to accurately portray the OHV designations outlined in each alternative. -BLM indicates many miles of roads and trails will be open for OHV use via the Preferred Alternative OHV Designation Map. However, most of the 'green lines' on the maps are actually closed to unlicensed OHV use. - All of the Chimney Rock/Summerville and Humbug trail systems should be left open. I request that you designate links to the Arapeen Trail System. Please keep all existing roads and trails open for vehicle use.	Please see general comment responses #19, #31 and #78
Paul	Sontana	Process and Procedures	This letter is to urge you to protect the areas within our Redrock Wilderness Act from the ongoing give away to special interests... As ATV use increase in the mid nineties and energy exploration and mining had slowed it seemed the value of the land for recreation and habitat for wildlife became all that more important... But if you have the foresight to see that the future of the West, with souring development and population growth will require these areas of open space for future generations to have a place that can only be saved once and if given up for short term greed, gone forever.	Please see general comment responses 12, #36 and #101
Mark	Sorensen	Recreation	A special recreation permit should not be required for non-commercial activities. The land belongs to the public - let them use it.	Please see general comment response #81
Russell	Spadafora	Socioeconomics	The BLM land holding surrounding Green River provides the economic stimulus to our community. I hope that you will give as much attention to my views as you do to those who only read about the area and treat it like a problem to be solved. I urge you to help us bring industry to our area. Rather than adding more restrictions on the use of the federal lands, I, for one, feel the time is right to lift restrictions and invite industry to develop in our region.. look for industry that fits in this area and call them to the table. Open federal lands for all of us. Allow drilling rigs to extract the resources that fuel our economy.	Please see general comment response #132
Robert and Page	Speiser	OHV Route Identification	It is extremely important to designate trails for specific uses to avoid conflict. Please designate specific trails for ORV use to keep it separate, so that those wanting a wilderness backpacking experience will not have to contend with the noise, soil erosion, and scarring caused by ORVs. Your office should take responsibility to clearly map and sign the trails. Furthermore, without enforcement, the plans will not be effective.	Please see general comment responses #19 and #79
Gary	Spencer	OHV Route Identification	It's come to my attention that your district is considering closing some of the roads to the back country. I think it's best to keep this access open to the public, especially at this time when other public lands are facing similar restrictions.	Please see general comment responses #10 and #19
Richard	Spotts	Minerals and Energy Resources	Please do not authorize issuance of energy leases within polygons of roadless lands that BLM has identified as having bona fide wilderness characteristics	Please see general comment response #101
Richard	Spotts	Wilderness	Please do not designate motorized roads or routes within polygons of roadless lands that BLM has identified as having bona fide wilderness characteristics	Please see general comment responses #12 and #36
Vicki	Stamper	Air	The DRMP/EIS fails to comply with the National Environmental Policy Act (NEPA) because it does not adequately analyze or disclose the air quality impacts that could occur as a result of the actions authorized under the DRMP/EIS. While contractors for the Bureau of Land Management (BLM) prepared an “Air Quality Baseline Report” (Air Quality Baseline and Analysis Report, Price Field Office, Resource Management Plan, August 2003), this report did not assess the increase in air pollution emissions that could occur under the various alternatives proposed for the RMP, and thus did not analyze the environmental impacts that could occur due to the increased air pollution that will be allowed under the RMP. Instead, the Air Quality Baseline Report relied on two prior EIS’s for natural gas development in the Price Field Office area (Ferron Natural Gas Project and the Price River	The BLM ensures compliance with all applicable local, state, tribal and federal air quality laws, statutes, regulations, standards, and implementation plans. While BLM is not directly responsible for air quality impacts that may result from non-BLM activities conducted on BLM controlled lands, some air quality impacts can be reasonably expected. BLM has addressed and

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			Coalbed Methane Project) for estimates of air quality impacts due to gas development. Yet, it does not appear that these two previously approved natural gas projects reflect all of the gas development that could occur under the Price RMP. Other development has been approved that presumably was not evaluated in these EIS's, such as the West Tavaputs Drilling Program (http://www.ut.blm.gov/westtavaputs/nrjul29.htm) or the additional coalbed methane wells being drilled in the Drunkards Wash area. In addition, for other air pollution issues that could be associated with the Price RMP, the report relied on qualitative discussions with no documentation to support the stated claims. For example, the report claims emissions from flaring would be insignificant with no estimation of emissions from flaring provided. As another example, the report claims that emissions from vehicular traffic on unpaved roads would not cause public health problems or regional haze problems because the particles are large, yet the report provides no data to support those claims. Thus, the Air Quality Baseline Report does not satisfy the requirement of disclosing environmental impacts of the Price DRMP. Consequently, the DRMP/EIS does not provide government officials or the public with a full understanding of the environmental consequences of the RMP and it fails to meet the intent of the NEPA regulations as provided in 40 C.F.R. §§ 1500 – 1508. 40 C.F.R. §1500.1(c) states the "NEPA process is intended to help public officials make decisions that are based on an understanding of environmental consequences, and take actions that protect, restore, and enhance the environment." Without a quantitative analysis of air quality impacts that could occur under the revised RMP, the BLM has failed to meet this NEPA mandate. According to the DRMP/EIS, the cumulative analysis was qualitative rather than quantitative "because of lack of detailed information that would result from project-level decisions and other activities or projects." (Page 4-3 of the DRMP/EIS). According to the DRMP/EIS, no regional scale air quality modeling was done because "emissions from normal BLM actions would not require regional scale modeling" and because emissions from industrial operations "would most likely be modeled by the company seeking to conduct the action." (Page 4-11 of the DRMP/EIS). Presumably, the DRMP/EIS is referring to modeling analyses that may be required in order to obtain an air quality permit from the State of Utah. State air quality permitting regulations cannot be relied on to satisfy the requirements of NEPA. Not only is this delay of analysis not allowed under NEPA, but the modeling analyses that are required under Utah permitting regulations do not necessarily require as thorough an analysis as required under NEPA (e.g., a cumulative analysis considering all existing and reasonably foreseeable sources of air pollution) and do not require any modeling for some sources of air pollution that would be allowed under the Price RMP. Such passing of the buck by the BLM to the state permitting agency is not acceptable under NEPA, which requires that the BLM rigorously explore all alternatives and thoroughly discuss the direct and indirect environmental consequences of each alternative in its EIS. See 40 C.F.R. §§ 1502.14, 1502.16. The qualitative approach in this case is also not justified considering that, for other BLM RMPs, the BLM has attempted to quantify air pollution emissions from development that would be allowed under an RMP. For example, for the Farmington RMP, the BLM determined a high development scenario of emission sources that would likely occur with gas development allowed under the RMP, although it must be noted that the BLM's analysis was not sufficiently complete to adequately assess cumulative air quality impacts. The fact that the Farmington analysis was incomplete was illustrated by the air quality analysis for the recently issued Northern San Juan Basin Coal Bed Methane Project Draft Environmental Impact Statement. The cumulative air quality analysis for the Northern San Juan Basin DEIS attempted to refine and expand on the sources and air emissions associated with gas development that could occur under the Farmington RMP, although even this refined	characterized these impacts from the various sources in revisions to the air quality section of the Proposed RMP/Final EIS. The Revised (Final) Air Quality Baseline Report (AQBR; Booz Allen Hamilton, 2008) calculates emissions by alternative, allowing comparison between alternatives. This includes updates to existing climate and air quality conditions as well as recognition of the most current and relevant regulatory framework. NEPA does not require BLM to do a quantitative analysis with out regard to the data available for such an analysis. The BLM must take a "fresh look" at each project and decide what level of air quality analysis is appropriate given the information available. In the judgment of BLM air quality specialists, the available, reasonably foreseeable data were not sufficient to go forward with dispersion modeling. It should also be noted that NEPA does not allow "worst-case" analyses, nor does it require or encourage the creation of baseless data for purposes of conducting a modeling analysis. It should also be noted that dispersion modeling, including a cumulative analysis, is included in the West Tavaputs Development DEIS which has been reviewed by the public.

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			analysis was still incomplete. Further, it appears that a quantitative assessment of oil and gas development impacts has been performed for the forthcoming Vernal and Glenwood Springs EISs. These RMPs and DEIS's, while flawed, provide examples that a more rigorous evaluation of likely air pollution sources associated with the Price DRMP/EIS can be done and, as discussed above, must be done pursuant to NEPA. The BLM likely has some idea of the areas of likely high gas development in the Price region (see, e.g., Maps 3-20 and 3-21 which show areas of "high" and "low" potential occurrence). Further, the BLM could determine the maximum well density that could be allowed under the RMP, estimate total increases in emissions, and perform a regional scale modeling of the emissions increases that could occur under the RMP as well as with all other sources in the region. Yet, the BLM failed to conduct such an analysis and thus failed to comply with NEPA. Even without conducting the required air quality impacts analysis for the DRMP/EIS, the air quality analyses relied on by the BLM in the Air Quality Baseline Report (performed for other EIS's in the region) indicate likely adverse air quality impacts, including potential violations of Clean Air Act standards, as a result of activities authorized by the Price RMP. First, the Air Quality Baseline Report indicates on page 10 that the natural gas-fired compressors have the potential to exceed Class II prevention of significant deterioration (PSD) increments for nitrogen dioxide (NO2), based on analyses done for the Ferron Natural Gas Project and the Price River Coalbed Methane Project. The Air Quality Baseline Report also indicates that "if all compressors were fueled by natural gas from the operating wells, the cumulative effect would be that standard visual range could potentially be reduced more than 10 percent on 11 days at Capitol Reef National Park and 2 days at Canyonlands National Park." (See page 16). In addition, page 13 of the Air Quality Baseline Report indicates that "[i]mpacts of prescribed fires have affected attainment status in communities downwind. . . such as Grand Junction, CO." (Presumably, this statement was referring to attainment of the health-based national ambient air quality standards (NAAQS) for particulate matter – either PM-10 or PM-2.5.) Thus, the air quality analysis relied on by the BLM for the Price DRMP/EIS shows that violations of the NAAQS and PSD increments and significant degradation of visibility in Class I areas could occur. Yet, the DRMP/EIS does not indicate that any significant adverse impacts on air quality will occur as a result of the modified Price RMP. These statements in the Air Quality Baseline Report further indicate the need for the BLM to conduct a proper air quality analysis for the Price DRMP/EIS, since these other studies that the BLM is relying on have shown that adverse air quality effects and Clean Air Act violations could occur. The BLM's disregard for the adverse air quality effects is at odds with the policy of NEPA expressed at 40 C.F.R. § 1500.2(f), which provides that Federal agencies "shall to the fullest extent possible use all practical means. . . [to] avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." The BLM's proposed action also conflicts with the Federal Land Policy and Management Act at 43 U.S.C. § 1712(c)(8), which requires land use plans to "provide for compliance with applicable pollution control laws," as well as the BLM's own planning criteria that actions must comply with Federal laws and regulations.	
Vicki	Stamper	Air	I believe the DRMP/EIS fails to adequately address all of the potentially significant air quality issues and fails to comply with the NEPA regulations. Further, the limited air quality analysis relied on for the DRMP/EIS indicates likely adverse air quality impacts, including potential violations of Clean Air Act standards, as a result of activities authorized by the Price RMP. The DRMP/EIS thus fails to provide the public with a comprehensive assessment of the air quality impacts that could occur from the activities allowed under the revised plan and fails to adequately inform the public whether the revised plan will allow for violations of the Clean Air Act.	The BLM ensures compliance with all applicable local, state, tribal and federal air quality laws, statutes, regulations, standards, and implementation plans. While BLM is not directly responsible for air quality impacts that may result from non-BLM activities conducted on BLM controlled lands, some air quality impacts can be

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				reasonably expected. BLM has addressed and characterized these impacts from the various sources in revisions to the air quality section of the Proposed RMP/Final EIS. The Revised (Final) Air Quality Baseline Report (AQBR; 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. NEPA does not require BLM to do a quantitative analysis without regard to the data available for such an analysis. The BLM must take a "fresh look" at each project and decide what level of air quality analysis is appropriate given the information available. In the judgment of BLM air quality specialists, the available, reasonably foreseeable data were not sufficient to go forward with dispersion modeling. It should also be noted that NEPA does not allow "worst-case" analyses, nor does it require or encourage the creation of baseless data for purposes of conducting a modeling analysis.
Vicki	Stamper	Air	The following provides my assessment of the analyses that should have been performed for the Price DRMP/EIS, based in part on air quality analyses I have seen in other DEIS's as well as on my knowledge of proper air quality analyses and NEPA requirements: 1. The DRMP/EIS Failed to Quantify the Increase in Air Pollution Emissions that Could Occur Under the Revised RMP. As discussed above, the DRMP/EIS did not attempt to quantify the increase in air emissions that could occur as a result of the revised RMP. Such an estimation of emissions must be done for each proposed alternative so that air quality modeling analyses can be performed to assess the impacts of the DRMP on air quality. Thus, for each alternative, the BLM should have determined the probable locations where the oil and gas development would occur, determined the number of wells and associated air pollution sources (such as increased roads and vehicular traffic, wellhead compressor engines, separation and dehydration units, central compression stations, flares, and other sources that may be associated with oil and gas development), and estimated air emissions from those sources. The BLM also should have estimated the increase in air emissions due to increased vehicular traffic allowed under the RMP. Further, the BLM should have estimated the increased emissions due to prescribed burning allowed under the RMP. This information should have been quantified and made available in the DRMP/EIS, but the BLM failed to do so.	The Revised (Final) Air Quality Baseline Report (AQBR; Booz Allen Hamilton, 2008) calculates emissions by alternative, allowing comparison between alternatives. This includes updates to existing climate and air quality conditions as well as recognition of the most current and relevant regulatory framework. In addition, emissions will also be compared to other sources in and nearby the Price Field Office planning area. Since the BLM cannot determine with reasonable certainty a number of parameters, it is not appropriate to model. The uncertainty of the modeling results from such an exercise would render the results useless. The BLM never does a PSD Increment Consumption Analysis. The BLM does not have the authority or responsibility to do such. Our analysis is about the project and alternatives. We compare to PSD increments strictly for disclosure of impacts. The PFO is being included in the White River RMP Amendment/Oil and Gas EIS ozone

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			2. The DRMP/EIS Failed to Include Any Analysis of the Impacts of the Price RMP on Air Quality. As discussed above, the DRMP/EIS did not include an analysis of the impacts on air quality that could occur under the various alternatives of the Price DRMP. The Air Quality Baseline Report relied only on analyses performed for the Ferron Natural Gas Project EIS and the Price Coal Bed Methane EIS, rather than compiling an emission inventory and analyzing air quality impacts of the increased air pollution that could occur under the Price RMP, as should have been done to comply with NEPA. With the emission inventory of all air pollution sources and locations compiled, as discussed in my above comment, dispersion modeling analyses should have been performed to assess the impacts on air quality from the alternatives of the Price DRMP. In order to comply with 40 C.F.R. §1502.24 (to ensure the professional and scientific integrity of the air quality analysis), the air quality analysis should have include the following components: a. A Near-Field Modeling Assessment Should Have Been Done to Assess Local Air Quality Impacts from the Price RMP. To assess whether the activities allowed under the various Price DRMP alternatives would comply with the national ambient air quality standards (NAAQS) and the prevention of significant deterioration (PSD) Class II increments, a near-field assessment of localized maximum ambient air impacts should have been performed for each of the air pollution source categories allowed under the alternatives of the Price DRMP – e.g., gas development (roads and natural gas engines), increased vehicular traffic, prescribed burning, etc. The maximum emission rates from sources over the averaging times of the standard for which compliance is being assessed should have been modeled. The modeling analysis should have been based on at least one year of quality-assured on-site, representative meteorological data or, if no on-site data was available, five years of meteorological data from the closest meteorological station representative of the area. See, e.g., Sections 9.3.a., 9.3.1.2., and 9.3.3.2 of EPA's Guidelines on Air Quality Models at 40 C.F.R. Part 51, Appendix W. For the NAAQS analysis, appropriate background concentrations reflective of air quality in the area should have been added to the modeling results. b. A Far-Field Modeling Assessment Should Have Been Performed to Assess Air Quality Impacts on the Nearby Clean Air Act Class I Areas. To assess whether the activities allowed under the various alternatives of the Price DRMP would adversely impact air quality in the nearby Class I areas, a far-field modeling assessment should have been done. Such an analysis should have been performed, at the minimum, for those Class I areas within 200 kilometers of the Price Field Office, including Arches National Park, Bryce Canyon National Park, Canyonlands National Park, Capitol Reef National Park, Zion National Park, and possibly even Mesa Verde National Park and the Weminuche Wilderness Area. The maximum emission rates from sources over the averaging times of the standard for which compliance is being assessed should have been modeled. For visibility impacts, this would require modeling of the maximum 24-hour average emission rates. The modeling analysis should utilize three years of mesoscale meteorological data, pursuant to Section 9.3.1.2.d. of 40 C.F.R. Part 51, Appendix W. The far-field analysis should have assessed the impacts of the alternatives of the Price DRMP on the Class I increments and on air quality related values including visibility and nitrate deposition. 3. The Price DRMP/EIS Failed to Include a Cumulative Air Quality Impacts Analysis. The Price DRMP/EIS also failed to include a cumulative analysis of air quality impacts that could occur under the various alternatives of the Price DRMP. Such an analysis is required pursuant to NEPA. Specifically, both near-field and far-field analyses	modeling effort. The BLM generally does not discuss air quality mitigation in an RMP unless there are potential significant impacts predicted. The Air Quality Common to All Actions has been amended to include reference to gas field engines.

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			with sufficient emissions and meteorological data inputs as discussed above should have been done to assess compliance with the NAAQS and Class II increments as well as to ascertain impacts on air quality related values and the Class I increments in all potentially affected Class I areas. The sources to be included in these analyses should have included all contributing industrial sources of emissions such as the power plants and co-generation facilities listed on page 14 of the Air Quality Baseline Report. Other large existing and reasonable foreseeable industrial sources outside the area that would likely impact the Price Field Office area should also have been included in the cumulative impacts analysis, as well as the reasonably foreseeable sources located within the Price Field Office area. These would include the existing Bonanza power plant and its proposed new unit, the proposed NEVCO power plant to be located in Sigurd, Utah, the proposed new power plant unit at the Hunter power plant, the existing Intermountain power plant units and its proposed new Unit 3, and any emissions sources associated with existing and reasonably foreseeable oil and gas development that would not be included in the emissions inventory developed for the Price DRMP. For the Class I and Class II increment analyses, an evaluation of all increment consuming emissions from the existing sources should have been developed, which would include all increases in emissions since the applicable minor source baseline date that have occurred at existing sources, as well as all new sources of emissions that came into existence after the applicable minor source baseline date and reasonably foreseeable sources not yet operating. These cumulative analyses should have been performed for the Price DRMP to provide the public with the environmental impacts of the various alternatives proposed for the Price DRMP and so that state government officials would be aware of any conflicts that could occur with the objectives of Federal, State, and local laws regarding protection of air quality. Further, such analyses should have been performed so that appropriate mitigations could be developed and put into place. Yet the BLM failed to conduct any cumulative analysis for various alternatives of the Price RMP. 4. Any Reliance on Compressor Engines Being Powered By Electricity Instead of Natural Gas Should Have Been Rigorously Evaluated as an Indirect Effect of the Price RMP. The Air Quality Baseline Report indicates that, based on the Ferron Natural Gas and Price Coalbed Methane EIS's, if the compressor engines associated with this gas development were electrical rather than gas-fired, there would be no direct air or visibility impacts. However, any reliance on use of the electric compressor engines still must be analyzed, since an indirect effect of such compressor engines is that electricity generation and thus increased pollution will occur at nearby power plants. All of the emissions increases at nearby power plants due to new electric compressor engines would consume the available PSD increment as emission increases that occur after the applicable minor source baseline date. Further, such emission increases could impact visibility at nearby Class I areas and potentially cause localized NAAQS problems. Thus, the BLM cannot dismiss potential air quality impacts based on the contention that electric compressor engines will take care of any air quality problems. The amount of increased electrical generation and pollutants from nearby power plants should have been assessed and modeled as part of the near and far-field modeling assessments discussed above, which the BLM failed to conduct for the Price DRMP alternatives. 5. The DRMP/EIS Should Have Also Assessed Impacts of the Price DRMP Alternatives on Ozone Concentrations. The DRMP/EIS did not provide any analysis of impacts from air emissions sources on ground	

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			level ozone concentrations. The ozone precursor emissions (nitrogen oxides (NOx) and volatile organic compounds (VOCs)) allowed as a result of the Price RMP could have a significant impact on the region's compliance with ambient ozone standards in the near future, which could in turn affect public health in the nearby population centers of Price, Castle Dale, Helper, and Huntington. Thus, the DRMP/EIS is negligent by excluding an analysis of this potentially very significant environment consequence. Although no county in Utah has been recommended as nonattainment for the 8-hour ozone NAAQS, ozone concentrations in several Utah counties have been approaching violations of the 8-hour ozone NAAQS including Utah county, which borders the Price Field Office area, as well as Salt Lake County, Davis County, and Weber County. Specifically, the ozone NAAQS is 0.08 parts per million (ppm), 8-hour average, and the 8-hour average values from 2000-2002 in these Utah counties ranges from 0.076 to 0.082 ppm. Further, information provided by the state of Utah shows that the 8-hour average ozone concentration in nearby Canyonlands National Park for 2001-2003 was 0.074 ppm. Elevated ozone levels are a major concern for public health and welfare. Ground level ozone can cause or aggravate respiratory problems even at low levels. Anyone who is active outside during periods of high ozone concentration can be affected, with the most vulnerable being those persons with respiratory problems. Ozone pollution can cause adverse effects to the physical environment as well. Ozone pollution is absorbed by plants and can cause leaf discoloration, reduced photosynthesis, and reduced growth as well as make plants more susceptible to disease, pests and environmental stresses. Ozone effects on trees are thought to accumulate over time such that whole forests or ecosystems can be affected. Data compiled by the National Park Service has shown that 8-hour ozone concentrations in Canyonlands National Park have been on the rise since 1993. Many plant species located in Utah National Parks have been identified by the Federal Land Managers as being sensitive to ozone pollution, include ponderosa pine, cottonwood, and quaking aspen. See Appendix 3A of the Federal Land Managers' Air Quality Related Values Workgroup (FLAG), Phase I Report, December 2000. Recent studies have indicated that the amount of light alkaline hydrocarbons and methane from oil and gas development can be quite significant (and are often underestimated), which can create optimal conditions for ozone formation. In fact, air monitoring performed across Texas, Oklahoma, New Mexico, Missouri, Arkansas and Kansas in 2001 and 2002 found high levels of hydrocarbons including methane, ethane, propane, and butane, as well as alkyl nitrates which are a byproduct of the reactions that form ozone. See Smog Underestimated in Southwestern U.S. at http://www.pnas.org/misc/archive100603.html#HL1. See also "Extensive regional atmospheric hydrocarbon pollution in the southwestern United States" by Aaron S. Katzenstein, Lambert A. Doezema, Isobel J. Simpson, Donald R. Blake, and F. Sherwood Rowland, available at the URL listed above. Considering the recent studies on the ozone potential of oil and gas development emissions, the elevated ozone concentrations in the region, and the health and environmental impacts that can occur, it is imperative that the DRMP/EIS disclose to the public the environmental impacts that could occur due to ozone formation from the various alternatives of the Price DRMP, as well as with all existing and reasonably foreseeable growth in contributing VOC and NOx emissions to the region. 6. The DRMP/EIS Should Have Included an Evaluation of Mitigation Measures. The DRMP/EIS should have included an evaluation of mitigation measures, subsequent to conducting the proper air quality analyses	

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			discussed above. Although the Air Quality Baseline Report did mention electric compressor engines versus gas-fired engines as one mechanism to avoid adverse direct effects, as discussed above this measure could result in adverse indirect effects which should have been evaluated. There are numerous mitigation measures that could be considered for the air pollution sources associated with oil and gas development, such as the requirement of meeting state-of-the-art emissions controls at compressor and other gas-fired engines, less dense spacing of wells, no development in certain areas where topography or proximity to a Class I area could result in adverse impacts, etc., yet the DRMP/EIS did not discuss or analyze any mitigation measures with the exception of a brief discussion of the use of electric compressor engines. These issues should have been addressed (subsequent to the required air quality analyses discussed above) so that the DRMP/EIS would include appropriate mitigation measures to avoid any adverse air quality impact to the greatest extent possible.	
Vicki	Stamper	Air	I believe the Price DRMP/EIS is seriously flawed in failing to conduct a proper air quality analysis of the effects of the Price DRMP and thus failing to disclose whether the Price DRMP will cause significant adverse effects on air quality in the region. The DRMP/EIS fails to meet the intent of NEPA and the implementing regulations.	See response to specific comments # 3546 and #3547
Greg	Stark	Wilderness	The Bush administration has promised to protect wilderness characteristics of public lands. Few public lands are more deserving of such protection than the wilderness-quality lands within the Price area. Your proposed plan is totally unbalanced in refusing to provide any meaningful protection for these magnificent and irreplaceable wildlands. On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including wilderness.	Please see general comment response #36
Jim	Steene	OHV Route Identification	If we open new lands, are we going to have enough increasingly shorter tax payer dollars to keep them safe, protected and clean? Dust Storms have devastating consequences.	Please see general comment response #19
Suzanne	Stensaas	Process and Procedures	Please, add me to the endorsers of the Castle Country Heritage plan. Utah is growing so fast and I do believe in multiple use; but we need to preserve our prehistoric heritage, have quiet places, and a place for motorcycles and ATVs.	Please see general comment response #35
David and Nike	Stevens	Minerals and Energy Resources	This proposed plan fails to offer a reasonable balance. Please rewrite it to consider the fact that other values exist on these lands besides oil and gas development. This is not multiple use; this is single use management. There needs to be valid consideration of other resources including wildlife habitat and nonmotorized recreation.	Please see general comment responses #1 and #18
David and Nike	Stevens	OHV Route Identification	If all of these proposed routes are designated open for motorized use, 80% of the land in the Price District will be within one mile of a road. Opportunities for quiet non-motorized recreation would be greatly impacted . This proposed plan fails to offer a reasonable balance	Please see general comment responses #12 and #19
David and Nike	Stevens	Wilderness	In signing the backroom deal with Gov. Leavitt in 2003, Norton stated that although she rescinded BLM's ability to designate wilderness study areas, BLM would use other means to protect these fragile and deserving landscapes. Yet in this plan--which includes areas such as the San Rafael Swell, the Book Cliffs, including Desolation and Nine Mile Canyons, and the Price River area--no areas beyond existing wilderness study areas have real, meaningful protection.	Please see general comment responses #36 and #109
Craig	Stirling	OHV Route Identification	All of the popular OHV Trail Systems must remain open. Your BLM maps must be updated to accurately detail the OHV designation outlined in each alternative.	Please see general comment responses #19 and #31
Virginia	Stockton	Process and Procedures	Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public	Please see general comment responses #35 and #36

First Name	Last Name	Category	Comment	Response
			lands.	
Patsy	Stoddard	Livestock Grazing	I think the BLM should maintain all valid and existing grazing rights within the Price Field Office jurisdiction. I do not think they should participate in any AUM buyouts by the various organizations who are trying to oust cattle from out public lands. Ranching is a big industry for out two counties and should not be hindered in anyway. Grazing is good for the grasses and encourages their growth when the ranchers have a good rotation system and the cattle are properly grazed.	Please see general comment responses #82 and #110
Patsy	Stoddard	OHV Route Identification	The route designation plan has closed too many roads and sometimes it is unclear where the closure begins. The maps have not been top notch in identifying what is open and what is closed. It has been very confusing for visitor and native alike. I would like to see a better map system. Roads which have been closed before they reach a specific scenic point are senseless. I think the road should be allowed to travel its course to the destination so people can see what is there.	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations by alternative.
Patsy	Stoddard	Recreation	In the San Rafael Swell SRMA, I think the numbers of people which constitutes a group should not be named. It is such a vast area, I think that it can accommodate larger groups without sustaining damage.	Please see general comment response #81
Patsy	Stoddard	Transportation and Access	I think the BLM should grant the title for the RS-2477 roads to Emery County to avoid a lot of litigation costs for the BLM as well as the county. The county should be able to choose which roads to maintain and which roads to close... So many people can't hike to these scenic destinations. They need access, either by vehicle or four-wheeler. Please do not take the public out of public lands and let everyone enjoy them, not just those who are able to hike to view some of these areas.	Please see general comment responses #11, #39 and #80
Patsy	Stoddard	Wild and Scenic Rivers	I do not think the BLM should be considering any wild and scenic river designations in Emery or Carbon counties. Emery County is made up of 90 percent public lands and any designations would result in increased controls and restrictions on lands which already contain enough rules and regulations.	Please see general comment response #150
Patsy	Stoddard	Wild and Scenic Rivers	Some of the river segments which have been earmarked as being eligible do not contain water. This to me is a real sign that this doesn't qualify for any type of special designation. Please remove all segments of rivers within the two county area for consideration.	Please see general comment response #88
Richard	Stone	Transportation and Access	I am writing to urge your support in maintaining existing backcountry airstrips within your jurisdiction.	Please see general comment response #21
Richard	Stone	Transportation and Access	I am writing to urge your support in maintaining existing backcountry airstrips within your jurisdiction. I have frequently visited (with my Cessna 182) numerous airstrips in Utah, including the "gems" of the backcountry strips such as Mexican Mountain, which I regularly fly into every spring and fall, Hidden Splendor, and Mineral Canyon near Moab. These and other airstrips throughout Utah are wonderful "airstrip trailheads", and are a great asset to the general aviation community, and provide a very low impact method of reaching our public lands for various activities such as hiking and camping, without leaving so much as a vehicle tire print except for on the airstrip itself. Many people complain of an airplane's noise impact, but in reality the noise of a approaching or departing single engine airplane lasts only a few seconds overhead, and has much less impact than the long lasting noise "print" of a ATV or similar vehicle that leaves permanent tracks on the fragile desert soil. In fact the last time I was camping at the Mineral Canyon airstrip I was surprised to suddenly see a single engine Cessna quietly touching down, as I had never even heard a sound until the plane was well into its landing roll.	Please see general comment response #21
Richard	Stone	Transportation and	I do support your own preferred "Alternative D", and I as well as many other general aviation pilots that enjoy the	Please see general comment response #21

First Name	Last Name	Category	Comment	Response
		Access	backcountry experience would greatly appreciate your efforts to preserve these special and unique "airports". They are as important to us as is a trailhead for a hiker, a "put-in" for a rafter, or a staging area for a recreational four wheeler.	
JoAnn	Stout	OHV Route Identification	Yes, It is a major form of recreation! We are not asking for new roads, leave open what is there., Where are trails?... We rode "Junes Bottom" several times, it is beautiful. The historic rock work on the dugway is a tribute to our ancestors. I did not approve of this closure. Evidence of misuse is nonexistent. Most of the riding is on rock and sand (that blows over before you return). It is a great photo opportunity that my children will never experience... You are concerned about environmental protection, yet closure is not the answer. People will misuse if there is no place to go, and that is what you are doing. Wash bottoms make great trails they cover the tracks naturally with the sand and they are great fun to ride in. Possible this is something you could consider. Providing no trails is a mistake, involve the public, local clubs and work together.	Please see general comment responses #10 #20
Ken	Stout	Minerals and Energy Resources	Protect those areas against gas/oil development and off-road vehicles. Protect the Red Rock Wilderness Act areas in the same way.	Please see general comment responses #36 and #101
Ken	Stout	OHV Route Identification	Protect those areas against off-road vehicles and to have the BLM designate very limited trails - and no trails in the Redrock Wilderness Act Areas.	Please see general comment responses #12 and #36
Ken	Stout	OHV Route Identification	As I believe representative of many folks from NW Arkansas who have been to SW Utah, I urge you not to allow this new designation of every inventoried trail to be open to motorized vehicles! It is inappropriate and not essential and detrimental to the land to do this. Please respond.	Please see general comment response #19
Andy	Stratton	Recreation	Dispersed camping is important to my family. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS. There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management "layers" outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment response #81
Marcus	Straub	Recreation	As a veteran river runner of over fourteen years, and a holder of a class 1 Utah guides license, I am solidly opposed to these restriction and the way in which they are attempting to be passed... This is not only a blatant disregard for the rights of all boaters, but also a continued display of the underhanded legislative process... Anyone who is truly aware of the Deso-Grey river experience knows that water flow, especially in the past four years, is challenging. And it is not expected to improve any time soon, given the prolonged drought that we find ourselves in. Not only are river runners dealing with often unbelievable mosquito populations, which can only be mitigated by getting below Jack Creek as quickly as possible, but also the remoteness of the canyons themselves... BLM will not only reduce the viability of enjoying this tremendous place for all boaters, but will also increase the likelihood of serious harm to them because of the increased exposure to diseases like West Nile, and poisons such as Deet... Putting these restrictions in place will prove to be financially challenging and even fatal to commercial river operations... These proposed restrictions will reduce the viability of utilizing this tremendous resource for all river runners. They will also increase the likelihood for injury, illness, and even death to those who use the canyons. Lastly, there is no reason to put this poorly thought out legislation in place which will hurt and even drive commercial outfitters out of business.	Please see general comment response #34
Marcus	Straub	Recreation	As a veteran river runner of over fourteen years, and a holder of a class 1 Utah guides license, I am solidly opposed to these restrictions and the way in which they are attempting to be passed. One has to wonder why the	Please see general comment response #34

First Name	Last Name	Category	Comment	Response
			BLM has neglected to allow an appropriate time period for public comment on this subject. These are important issues that will affect the lives of all boaters, in potentially many different ways. Issues that truly deserve to be out in the open, so that there is opportunity for real dialogue in regards to them. But the BLM has decided to try and sneak these proposed restrictions past the private and commercial boating community. This is not only a blatant disregard for the rights of all boaters, but also a continued display of the underhanded legislative process that is being employed to create laws that simply do not meet the needs of the resource, and of those utilizing this resource. There should be serious concern on all sides for the way in which this matter is being handled.	
Marcus	Straub	Recreation	Given the remoteness, motors provide a quick and efficient means by which injured or ill passengers, private or commercial, can be removed from the river corridor for the necessary and even critical care that is needed in order to return them to good health. By placing these proposed restrictions on motorized river travel, the BLM will not only reduce the viability of enjoying this tremendous place for all boaters, but will also increase the likelihood of serious harm to them because of the increased exposure to diseases like West Nile, and poisons such as Deet, which will have to be applied even more frequently. In addition, time delays, due to the lack of motors, will prevent those who are ill or injured from receiving needed medical care as quickly as possible. I am sure that increasing the likelihood for serious injury or illness, and even death is not part of the BLM's mandate. This should be considered as you move forward with your unsubstantiated proposed restrictions to motorized river travel... These proposed restrictions will only increase the challenges facing all boaters as they seek to enjoy this amazing natural resource. Commercial outfitters will be particularly hard hit by these proposed measures... Putting these restrictions in place will prove to be financially challenging and even fatal to commercial river operations. The BLM does not have the right to put ill-conceived measures in place that will harm a person's right to carry on their legitimate commercial operations... A well conceived proposal that takes into account the concerns and needs of all sides, and seeks to reach a common ground that will not substantially damage one group's ability over another's to continue to utilize this resource, is what is needed. The way that the proposed restrictions are being put forward only undermines the credibility of the BLM. You can do better and it is your responsibility to do so... I am solidly opposed to these proposed restrictions to motorized travel through the Deso-Grey river corridor. These ill-conceived proposed restrictions have not been given the necessary exposure to insure that all sides can come together in order to bring their concerns and solutions to the table. The restrictions that the BLM is proposing do not fully take into account the impacts of this proposed legislation. These proposed restrictions will reduce the viability of utilizing this tremendous resource for all river runners. They will also increase the likelihood for injury, illness, and even death to those who use the canyons. Lastly, there is no reason to put this poorly thought out legislation in place which will hurt and even drive commercial outfitters out of business.	Please see general comment response #34
Christine	Stringer	Process and Procedures	Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands. It is the right choice as stewards of the Earth, already is serious imbalance. The ability to protect our future survival as a species, necessitates the ability to protect the resources we still have. The ability of the land to flourish is directly proportional to our ability to protect it and our very own survival conjoined to the environment.	Please see general comment response #35
Chuck	Stroble	Minerals and Energy Resources	As a public agency, BLM's actions should be above reproach and it should not fall into the grasp of the greedy gas and oil industries for what the USGS estimates to be only 4 days worth of oil and less than 4 weeks worth of natural gas.	Please see general comment response #18
Ned	Suesse	OHV Route Identification	The Chimney Rock area offers a fantastic riding experience with minimal impact to other users and to the long term health of the area. This area should remain open to ORV users as it is today. I belong to a motorcycle club	Please see general comment responses #20 and #31

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			that does a great deal of trail work in the Colorado Front Range, and since many of us enjoy your area in the winter months, I am sure that we could get a crew together to come help with any management needs that you have.	
Brian	Sullivan	Minerals and Energy Resources	Traveling to the river put in I found myself surrounded by oil drills spotted throughout the desert. I felt a relief to reach the put-in and be out of sight of oil companies. The purpose of this letter is to express my concern about the current land leasing of oil companies, families cannot raft the river without having the noise of drilling for oil.	Please see general comment response #18
Dan	Sullivan	Cultural Resources	The following are three examples of individuals or situations that have biased the process which renders the document technically and procedurally flawed. These comments have been taken directly out of newspapers. In an internal e-mail dated Aug. 27, 2001, Garth Portillo, the BLM's state archeologist, acknowledged that SUWA and the NDRC "have identified what I see as the weakest point in our cultural resource compliance efforts for oil and gas leasing - our deferral of tribal contracts until post-lease activities are proposed." Whoever leaked this information to SUWA should also mention the cultural and tribal consultations are done before any activity is allowed on leased lands.	BLM has made an extensive effort to consult with Native American Tribes that may have ties to the Price planning area. BLM began during scoping to identify concerns of Native Americans. Meetings were held and the Draft RMP/EIS was released to the public and sent to Native American Tribes. Follow-up visits have been made to tribes who requested them. Consultation will continue throughout the process. Chapter 5 of the Final EIS has been updated to reflect all consultation.
Dan	Sullivan	OHV Route Identification	Another specific sabotage within the BLM is regarding the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trail systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Have these submittals been lost in the process by individuals within the Price office who have a bias against OHV?	Please see general comment response #20 and #31
Dan	Sullivan	Process and Procedures	The document is technically and procedurally flawed because it doesn't maximizing minerals development potential in areas with greatest potential for development. This is the highest and best use in most areas. Conversely it does not target enough recreation management in areas with the highest potential for development along the lines of multiple uses. It is necessary to provide for quality recreation settings, experiences, and benefits in an environmentally appropriate manner along with development of minerals. There is no reason work and pleasure activities cannot coexist.	Please see general comment response #1
Dan	Sullivan	Transportation and Access	The document is technically and procedurally flawed because it wants to close roads and add layers of ACEC which do nothing but lock the public out of public lands.	Please see general comment responses #10 and #37
Dan	Sullivan	Wilderness	Since the existing WSAs have not been designated wilderness there is no need to add any more lands in that category. It appears this is not what the public or Congress has in mind. Most of the existing WSAs were overlaid on developments in progress and so called wilderness areas are cherry stemmed in?	Please see general comment response #114
Dan	Sullivan	Wildlife and Fish	Vast areas are rendered seasonally off-limits as a result of so-called "Critical Winter Range" considerations. These areas of Critical Winter Range are often used arbitrarily not only to restrict winter drilling but also the acquisition of seismic data and – ultimately - reduce environmentally responsible hydrocarbon resource development. Implementation of these restrictions fails to acknowledge: -Seismic data acquisition has never been shown to have appreciable deleterious impact on wintering big game populations. These operations just plain don't disturb the animals. -Allowing data acquisition in the winter will have near-zero impact by our vehicles on the earth's surface thanks to	Please see general comment response #44

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			frozen ground conditions during those months. Seismic activity on the North Slope of Alaska is restricted to winter months for just this reason. - Frozen ground allows the transmission of geophysical superior data by reducing the amount of attenuation and dispersion of the compression-wave energy.	
Kent	Sundgren	OHV Route Identification	Please consider my comments seriously, there are millions of OHV users who are legal users of our public lands, They should not be ignored or abused at the behest of the misinformed environmental element... The essential role of non profit recreational clubs in volunteer and OHV grant programs is well documented. The importance of volunteers in successful OHV management is extensively documented in BLM and Forest Service recreation policy and management guidance. Non-profit recreation clubs are often an integral part of "self policing" efforts such as the "Trail Patrol" or "Good Will Rider" programs. Small to mid sized clubs supply tens of thousands of volunteer man-hours per year. These also serve as "matching funds" for OHV grants, which are growing increasingly important to land managers as recreation budgets decline. BLM's groups size limits in all of the alternatives unnecessarily and unfairly subjects small to mid sized non profit recreational activities to the same Special Recreation Permit process required for true non-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with the proven 50 vehicle group size limit.	Please see general comment responses #10, #19 and #81
Kent	Sundgren	OHV Route Identification	I am interested in knowing what BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. I understand the local OHV community submitted detailed route information regarding these trails systems early on in the process. I am very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. Public input is a critical component of BLM's lawful planning process. I object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of my strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use... The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans, however, the DRMP/DEIS is not clear and concise regarding which roads and trails will be open for OHV use. Various "layers" of management make it almost impossible to understand the travel rules for lands in each SRMA as well as the ERMA. The BLM must correct this error and accurately disclose which roads and trails will be available for OHV use in each alternative.	See general comment responses #19, # 20, #31, and #37.
Kent	Sundgren	Recreation	Dispersed camping is important to our members and their families. It is impossible to tell how many dispersed campsites each alternative will leave open. Please correct this problem in the Final EIS... There is no justification or rationale for the limits on dispersed camping, or the group size limits outlined in Alternatives A through D. I do not support overly restrictive and impossible to understand restrictions on camping and vehicle recreation. I oppose the management 'layers' outlined in the draft plan because they impose restrictions that are not warranted, are impossible to understand and difficult to comply with.	Please see general comment response #81
Marcia and Burt	Sundquist	Minerals and Energy Resources	Preserve these special places. Do not offer them to development for oil and gas.	Please see general comment response #18 and #101
Marcia and Burt	Sundquist	OHV Route Identification	To minimize their impact, specific trails need to be designed and clearly mapped.	Please see general comment responses #15, #19 and #31

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Tod	Susacta	Minerals and Energy Resources	Please use common sense to protect all areas within America's Redrock Wilderness Act... companies will come in and destroy by drilling which will ultimately lead to the ruining of any wilderness character, endanger wildlife habitat and eventually destroy rare and very essential riparian areas.	Please see general comment responses #36 and #101
Tod	Susacta	OHV Route Identification	And please do not designate, or open any new areas where off road vehicle use is allowed without limits. And please no more 'open areas'.	Please see general comment response #19
Fred	Swanson	Minerals and Energy Resources	I believe that oil and gas leasing and development could be allowed outside these roadless lands, providing, of course, that normal measures are taken to protect wildlife, archaeological and water resources.	Please see general comment response #18
Fred	Swanson	OHV Route Identification	Protection of soils is critical in this desert area. I applaud the BLM's efforts to restrict vehicle use to designated routes instead of allowing wide-ranging tire tracks to spread over fragile desert soils. Vehicle routes should be limited to hard-surface routes that will not erode easily. Examples would include the Straight Wash-Eardley Canyon access road from Highway 24 to the mouth of the San Rafael Reef (but not beyond), the road access to Tomsich Butte and Muddy Creek (but not along the creek bed itself), and the Wedge Overlook road. I support closure of such areas as Behind the Reef, Segers Hole, the Muddy Creek streambed, Devils Canyon and any of the open-country, braided motorcycle tracks that are spreading throughout this region. Desert soils simply cannot survive this kind of abuse, whether it comes from powered vehicles, mountain bikes, or even hikers' boots.	Please see general comment responses #19 and #72
Fred	Swanson	Wilderness	My concern is that roadless areas identified by the BLM as having wilderness characteristics in your 2000-2002 "reinventory' be protected from further degradation by road building, oil and gas development, and off-road vehicle use. These areas, as well as the existing wilderness study areas, should be reserved for the protection of their natural values as scarce remnants of the original American West. I hope you will guard against commercial development and vehicle use in the Muddy Creek-Crack Canyon area, Mussentuchit Badlands, Moonshine Wash and the upper Labyrinth Canyon area, all of the Sids Mountain roadless area (including North and South Coal Wash), Mexican Mountain, Devils Canyon, and the entire Desolation canyon roadless area. These areas deserve protection as well as WSAs such as the San Rafael Reef and the core of Sids Mountain and Mexican Mountain.	Please see general comment responses #36 and #109
John	Swanson	Wilderness	Please accept my following comments concerning the Plan statement, BLM, Price Field Office. I urge that each of the following areas with acres, be designated wilderness: Cedar Mountain 98,000; Devils Canyon 35,000; Eagle Canyon 58,000; Esetony Butte 34,000; Hondu Country 31,000; Jones Bend 4300; Jims Stone Cliffs 38,000; Test Spring Wish 55,000; Mexican Mountain 151,000; Molan Reef 51,000; Muddy Creek 361,000; Mussentouchit Badlands 38,000; Price River-Humbug 148,000; Red Desert 61,000; Rock Canyon 28,000; San Rafael Reef 172,000; Didom Wajam 161,000; Upper Muddy Creek 303,000; Wild Hand Mua 139,000; Deobnough Canyon 20,000; Desolation Canyon 831,000; Diamond Canyon 251,000; Hidout Canyon 19,000; Jowell Bitten Creek 22,000; Mexico Point 23,000; Sunday School Canyon 28,000; Dunvey Point 13,000; Turtle Canyon 56,000; White River 38,000; Winter Ridge 58,000 and to always promote solitude.	Please see general comment responses #36 and #120
Paige	Swartley	Cultural Resources	I am concerned that the RMP's preferred alternative leaves Nine Mile Canyon open to unwarranted industrialization. Allowing non-surface occupancy resource extraction in this area has great potential for damage to priceless and irreplaceable Native American cultural and spiritual sites. Drilling under the ground toward the canyon bottom could disturb the known 10,000 petroglyphs, plus undiscovered areas of rock art. Further, the full impact of Nine Mile Canyon to both visitors and Native people cannot be preserved by simply cordoning off known and highly visible rock art panels.	Please see general comment response #9
Kevin	Sweeney	OHV Route Identification	I have been a recreational user of the San Rafael Swell and Desolation-Gray Canyon areas for some twenty years and I am quite disturbed with the proposed protection or lack thereof provided by the draft RMP in these	Please see general comment responses #12 and #36

First Name	Last Name	Category	Comment	Response
			areas. I believe it is inappropriate to allow for any open ORV use in areas with WSA designation and particularly areas that are under consideration as part of the America's Red Rock Wilderness Act. I do not feel that the draft RMP reflects a careful analysis of the impact of specific ORV use in particular areas and on particular trails. I have seen firsthand the extensive damage done by ORV use in some of these areas and the willful disregard of some ORV users for WSA signage. The BLM needs to develop a more effective strategy to appropriately limit ORV use and avoid the continued damage being done to sensitive WSA areas by essentially unlimited ORV use.	
Kevin	Sweeney	Process and Procedures	The Castle Country Heritage Plan offers a much more balanced approach to use of the land by extractive industries and ORV users and provides better protection for these areas of unique wilderness value than any of the alternatives in the draft RMP. I endorse this plan and urge you to evaluate this proposal and strongly consider its adoption as the preferred alternative for the Price RMP.	Please see general comment response #35
Troy	Sweeten	Socioeconomics	I generally do not make comments on controversial items such as the current RMP. However, I believe your agency owes it to the towns in Eastern Utah to show that your decisions will not hurt our economy. For every drill rig you regulate out of our area, our economy suffers. I would appreciate you taking time to find out just how much money our community stands to loose by the regulations you are considering placing on coal, natural gas, and off-road access.	See general comment responses #132 and #133
Jason	Swell	Recreation	Four stroke motors are not necessarily the answer. The technology in two stroke motor efficiency is here. We shouldn't have to acquire a four stroke motor to lessen environmental impact. I believe that establishing emissions could be a nice alternative to banning the two stroke motors. I furthermore oppose the proposed limiting the number of days motors can be used, and the 5000cfs cut-off. Motors help in making for the best trips possible.	Please see general comment response #34
Frederick	Swinson	Cultural Resources	Please save and protect Nine Mile Canyon, Utah.	Please see general comment response #9
Ezra	Tamsky	Minerals and Energy Resources	Please reconsider your intentions to open up San Rafael to the drilling and mining interests. Since there's not enough energy there to sustain the U.S. for more than a week, it seems the only motive applicable is profiteering. There must be a better way that you, as an agent of the federal government and therefore a target of my tax dollars, can placate the oil, mega-car, gas-guzzling industry/ people of this country.	Please see general comment response #18
Steven	Tanner	Cultural Resources	Another issue is the Green River. It is unclear to me how the BLM can govern the Ute Nation as the Ute Reservation encompasses both sides of the river.	The Uintah and Ourray Reservation boundary was established in Ute Indian tribe v. Utah [733 F. 2d 1087 (10th Cir. 1985) 9-17-85]. The land west of the Green River, while inside the reservation boundary, is not Ute land. It is Public Domain land, managed by the BLM. Decisions the BLM makes on these lands require the concurrence of the Ute Tribe. BLM will continue consulting with the Ute Tribe in development of the final RMP.
Steven	Tanner	Minerals and Energy Resources	Without a mandate set for the BLM to prove validity of the value of the Mineral and Energy leased resources, the Valid Existing Rights can become a tool for procrastination at any level of action toward low or marginal value resources under current leases. This in turn can and will directly affect other resources within the boundary's held by those rights.	Please see general comment response #17
Alan	Taylor	OHV Route Identification	While I am in favor of Preferred Alternative D in most cases, references to the popular Chimney Rock/Summerville trail systems and Arapeen Trail connector routes imply that they will be designated as open to vehicle use (see DRMP/DEIS 2-82, 2-83), but it is unclear whether these popular OHV routes will remain open or	Please see general comment response #20 and #31

First Name	Last Name	Category	Comment	Response
			not. I am concerned that none of these popular trail systems are included in the Preferred Alternative OHV Designation Map (DRMP/DEIS Volume 2 Appendices & Maps, Map 2-56). The plan does a good job of confusing the public and includes some of the most restrictive recreation management on federally managed lands outside a National Park.	
Sandra	Taylor	OHV Route Identification	I wish to register my protest to your proposal to open lands to ATVS. Of the places on the list, I specifically protest the inclusion of Cedar Mountain, Desolation Canyon, and the San Rafael area. These are used a lot by backpackers and should be preserved for them.	Please see general comment response #19
Trent	Taylor	OHV Route Identification	I support doing away with random or at will cross country travel in the San Rafael. Anyone blazing their own trial when there are enough established trails in the area is an idiot and gives a bad name for all of us whether we travel by foot or OHV. That said I believe that closing down existing roads and trails would be a very bad idea and will only lead to overcrowding and therefore cross country travel. Better education and enforcement of common sense, good for everyone laws are a necessity in this country. I urge you to not bend too far in either direction, OHV use or land closures. Hope this helps.	Please see general comment response #19
Robert	Telepak	OHV Route Identification	3) The San Rafael Route Designation Plan is still not finalized and still is under 4 pending appeals to the Department of Interior Board of Land Appeals. The appeals specifically are IBLA No. 2003-169, 170, 171, and 172. They have been pending since April 3, 2003. Approval of the DRMP requires implementing the above-mentioned Route Designation Plan - but it is under appeal and this will confound implementation.	The appeals referred to in the comment have been resolved and the San Rafael Route Designation Plan is final as described in the Proposed RMP/Final EIS. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Also see general comment response #19.
Robert	Telepak	Process and Procedures	The authors of this DRMP and DEIS have gone far beyond their authority within the BLM regulations, guidelines, and policies for planning... The personnel in the Price Field Office responsible for this document have gone far beyond the national and state BLM planning guidelines. I believe it is the Price outdoor recreational planners who have principally written this document... The DRMP and DEIS as presented are extraordinary (and I believe very purposely) complicated and overlapping with regard to excessive "management layers" to the point of not making clear sense and being internally contradictory...	Please see general comment responses #1and #37
Robert	Telepak	Recreation	The national BLM has a reasonable policy of permits for recreation - namely, only required for groups that were over 50 vehicles, involved commercial guides or collected money for the event, or involving competition such as races. This system has worked well. Yet, the Price BLM authors of the DRMP have taken it upon themselves to propose a much more extensive and very restrictive permit system, even though there is no proven or demonstrated need for such a system!	Please see general comment response #81
Robert	Telepak	Wilderness	4) Continued illegal management of Wilderness Study Areas (WSA) as if they were already designated Wilderness Areas, and creating new but similar closure concepts... the planners are using other management 'tools' such as ACEC, SPNM, and ROS primitive in a similar fashion to the use of WSAs as a method to close large areas. I believe this is the same sort of "closure management" as with WSAs, just with a different name.	Please see general comment responses #108 and #112
Gwen	Terpstra	OHV Route	Mountain Dew trail and Curse Canyon... I've heard rumors that both places might be closed down and it makes	Please see general comment response #20 and

First Name	Last Name	Category	Comment	Response
		Identification	me very upset to hear that because I had a very good time at both places and hopefully there will be times I can visit these areas again in the future.	#31
Katherine	Thanksgiving	Minerals and Energy Resources	Nine Mile Canyon is a national treasure. I can't believe anyone would even consider drilling for gas and oil in this area! This feels like a real betrayal of trust on the part of the Bureau. Please, please reconsider and do not allow this area to be impacted.	Please see general comment response #18
Ava	Thiesen	Minerals and Energy Resources	Protect our national heritage in preserving the gem that is the Utah Wilderness from drilling for gas and oil. No more-stop now.	Please see general comment response #101
Dan	Thomas	OHV Route Identification	I believe that the BLM is being too restrictive by requiring that travel is limited to designated routes, there are several areas that are suitable for open travel and existing trails.	Please see general comment response #19
Dan	Thomas	OHV Route Identification	Myself, friends and family recreate often in the Chimney Rock area and have been informed that although GPS coordinates have been given to the BLM showing the location of trails in the area that none of them are in the new proposed plan. It is extremely important to myself, family and friends that access to this very important trail system is maintained.	Please see general comment responses #20 and #31
Dennis	Thomas	Minerals and Energy Resources	Protect these magnificent wildlands from oil and gas development	Please see general comment responses #18, #36 and #101
Dennis	Thomas	OHV Route Identification	as well as damage from off-road vehicle activity.	Please see general comment response #19
Dusty	Thomas	Cultural Resources	Our forefathers who were great men of high caliber suffered, died and sacrificed much to secure in us their posterity, a great and wonderful legacy of beauty and freedom, both to please the eye and gladden the heart. But what sort of legacy will we leave our posterity in generations to come? When I see and hear on the local newscast and have even witnessed and stunned at the tragic evidence of the vandalism and defacing of our most precious treasures such as our native American hieroglyphs and petroglyphs. Ugly graffiti and senseless gibberish such a Bufod and Betty married over ancient witnesses of civilization gone by. I and many others were appalled and heartbroken over these senseless and immature and irresponsible testaments of our fellow man and citizens who are or should be showing this legacy, at least respectably in consideration of others if not appreciatively. If not, then I for one feel that it should be among the highest of priorities to enforce strict laws and severe penalties for such insidious outrages. I do not wish at this time to categorize or itemize the many numerous issues concerning conservation verses recourses. I only say this, that it is my hope and sincere prayer that great and wise men of the same caliber as before hand mentioned, at the beginning of this letter can and will take control in their leadership to enforce and preserve our precious heritage for true citizens of these United States of America to always enjoy, today, and tomorrow!	Please see general comment response #9
Kim	Thomas	Minerals and Energy Resources	The plan would open some 98 percent of lands that should be preserved as wilderness (but have not yet been protected by Congress) to drill pads, roads, waste pits and more. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development.	Please see general comment response #101
Lynn	Thomas	Process and Procedures	This plan is clearly geared to preservation of the lands by simply, and unfairly, restricting the public from it - and I feel your function as caretaker and managers should be to preserve it for our use - not from our use. It is, after all, our land... There is no reason why we should be restricted from our continued use of the land as we always have. Your function should be to preserve it for our continued use... Perhaps you should have more people in the field attending to implementation of your existing regulations - and fewer sitting at desks attempting to write additional restrictive regulations? Please scrap the present document and go back to the drawing board - this time with a	Please see general comment responses #1 and #143

First Name	Last Name	Category	Comment	Response
			proper emphasis on helping us to USE our land wisely. This should include provisions for all of us who use the land - including those of us who ride horses, four wheel drives, ATV's and Motorcycles - as well as those who carry backpacks.	
Norris	Thomlinson	Process and Procedures	The Price Resource Management Plan draft alternatives are a travesty for Redrock Wilderness. Please reject this destruction of our public lands and instead adopt the Castle Country Heritage Plan.	Please see general comment responses #35 and #36
Della	Thompson	Wilderness	Concerning oil and gas exploration and development in the area I would like to say that a natural area such as this is important to the entire country. The limited supplies of gas and oil that would become available do not compare to the value of the land as it now exists. There should be no oil and gas leasing allowed in Wilderness Study Areas, those areas in America's Redrock Wilderness Act or the areas previously identified as having wilderness characteristics under the '202 process. There should also be no further exploration or development in the Nine Mile canyon so that archeological treasures can be preserved.	Please see general comment responses #36 and #101
Elaine	Thompson	Minerals and Energy Resources	Allowing companies to lease, explore for oil and gas, and ultimately develop these lands, ruins the stunning scenery of this unique area, degrades water quality, causes harmful soil erosion, endangers wildlife habitat, and destroys rare but essential riparian areas that should be protected.	Please see general comment responses #18 and #101
James	Thompson	OHV Route Identification	I¹d like to see fewer open OHV routes along and in the vicinity of the Price River segment between Mounds Bridge and the Book Cliffs escarpment.	Please see general comment response #19
James	Thompson	Wild and Scenic Rivers	At the very least, Muddy Creek and the Price River (Mounds Bridge to at least a few miles west of Highway 50 & 6), should also be included in the Preferred Alternative	Please see general comment response #25
James	Thompson	Wild and Scenic Rivers	Given the number of river/stream segments that are eligible/suitable for Wild & Scenic River status in the document and then given recognition in Alternative C, it hardly seems fair that Alternative D has so few that are recommended.	Please see general comment response #25
James	Thompson	Wilderness	While I applaud the BLM for recognizing various "Non-WSA Lands With or Likely to have Wilderness Characteristics", I think more could be done to protect them from further disturbance, especially in the Price River environs. Already I¹ve mentioned fewer route designations or more Wild & Scenic River recommendations--but I think also other designations, like an ACEC or SRMA would be appropriate. Here is where even Alternative C is lacking--in that neither C nor D give the Price River (Mounds Bridge to Highway 50 & 6) its due protection. Additionally, I could go for boundary changes or in some cases, such as the Price River area--as it¹s way too big. The important sections of this area are, of course right along the river, but also the Humbug Canyon area. Also, I can agree with the BLM where map 3-27 shows Eagle Canyon, Flat Tops, Lost Spring Wash, Molen Reef, Rock Canyon, Sweetwater Reef, and Wild Horse Mesa as just "likely to have Wilderness Characteristics". In my opinion, these areas could definitely undergo boundary changes to reduce their size, (and even elimination in some cases). But I also think the BLM has done well to recognize the other Non-WSA Lands "with Wilderness Characteristics" as proposed by certain citizen-conservation groups.	Please see general comment responses #36 and #109
Melissa	Thompson	Process and Procedures	I am writing to ask you to adopt a management plan for the San Rafael Swell and its surrounding areas that places a focus on protecting passive recreation and conservation values. As a regular hiker and visitor of the area, along with so many others, my experience and that of my family's is marred by off road vehicles. I am concerned that oil and gas development in the Swell will further interfere with recreational use and harm the area's ecosystem, which is already heavily burdened by human activity... The proposed plan fails to strike a balance between preservation, recreation, and energy development... In addition, I write to ask you to support the	Please see general comment responses #35 and #36

First Name	Last Name	Category	Comment	Response
			Castly Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you... Please approve a management plan that protects Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon.	
Melissa	Thompson	Wilderness	The current draft management plan seems to favor industry over the interests of the majority of the American public - -interests in recreation and preserving our public lands for the use of all of us. The proposed plan fails to strike a balance between preservation, recreation, and energy development. Instead, it leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions. In addition, I write to ask you to support the Castle Country Heritage Proposal that the Southern Utah Wilderness Coalition has submitted to you. This plan is more balanced than the proposed draft. It protects our public wilderness lands from oil and gas leasing and development and from excessive off-road vehicle use. It offers a reasonable plan for lessening the impact of ORVs on the land while providing opportunities for primitive and non-motorized recreation. It reconciles competing interests.	Please see general comment responses #35, #36, and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Jeff	Thomsen	Alternative Maps	The Chimney Rock/Summerville Trail System must be kept open and designated specifically as such on all maps. It would appear to me that this specific OHV trail system has been strategically omitted from the maps, despite statements to the contrary. All maps should be complete and clearly designate what OHV routes will be open vs. closed for each plan. Links to the Arapeen Trail System should be clearly designated as well. The maps should also make it very clear as to which routes would be designated for "licensed" OHV use vs. "unlicensed" OHV use. Many routes are impossible for highway duty "licensed" OHVs to travel on, but could be very suitable for non-highway duty "unlicensed" OHV travel, such as personal 4WD vehicles. Land access deception by such tactics is inappropriate in governmental documents such as the PFO DRMP and needs to be clearly designated in each alternative plan.	Please see general comment responses #20 and #31
Jeff	Thomsen	OHV Route Identification	While I understand that the BLM has a tough assignment in trying to make the best decisions for all concerned, it has been my observation, during my lifetime, that the decisions being made by the BLM & the US Government in general are not in the best interest of the general public or the public at large, but are in the best interest of a very small minority, usually those who want to limit or abolish access to the public lands of this great country to only those who want to hike into many of those areas. This philosophy has been disguised as setting aside "wilderness areas" that are supposedly being protected for the benefit of all, yet very few persons are able to enjoy any benefits or experience these wilderness areas in any way. Since the ability of persons to hike into remote areas results in a very few number of people being able to do so and also severely restricts the amount of land able to be covered while hiking, it is a common sense conclusion that if the BLM &/or US government wants to provide such exclusive recreational areas for those who wish to experience this type of activity, that the land areas in which to do so should be considerably smaller in size than those land areas that would be used by a greater number of people who are able to cover much greater distances than is possible by hiking. Historical actions on behalf of the BLM & US Government are in direct opposition to this common sense conclusion. Instead of making larger areas available to multi-use motorized travel, these areas are being taken away from multi-use motorize travel with each new land use plan that is implemented. Frankly, I am tired of such actions by the BLM &/or US Government and would like to be given an answer as to why the special interests of environmentalist	Please see general comment responses #19 and #80

First Name	Last Name	Category	Comment	Response
			hikers is being given such overwhelming preference in the outcome of decisions being made. As the population of the US continues to grow older, most of the citizens of this great country cannot hike into many of the remote, yet wonderful and majestic areas where all citizens should be able to go. I think it is cruel and selfish on the part of the BLM & US Government to put such restrictions on land access that it denies the opportunity to view such areas for so many of the citizens that have paid for the operation of this country for their entire lives. It is long past the time to start moving in a direction that gives citizens more access to public lands for recreational purposes, rather than less access.	
Jeff	Thomsen	OHV Route Identification	I think it should be specifically designated as to exactly what OHV closures would be implemented by the BLM for each alternative plan being proposed. The SRRDP should state exactly what routes will remain open and which would be closed. Personally, I don't want to see any of the current trails and routes closed to OHV use.	Maps 2-71 through 2-74 of the Proposed RMP/Final EIS show OHV route designations for each of the alternatives analyzed in detail. Also see general comment responses #10 and #19.
Jeff	Thomsen	OHV Route Identification	While I understand that larger groups may at times have a bigger impact on the land, it has been my experience that larger groups such as OHV/4WD clubs are usually very respectful of the land and do major service projects to improve the land through private funds and donated labor. To limit or restrict such group activities is just plain wrong and unjustified. Limiting large, unorganized group activities to approximately 50 persons is understandable and acceptable, in my opinion, but not larger organized group activities. Maybe a good solution would be to grant permits for such large organized group activities.	Please see general comment response #81
Jeff	Thomsen	OHV Route Identification	All existing roads & trails should be left open for motorized vehicle use. I don't mind restricting travel to existing roads & trails, but most of these roads and trails have been in existences for many decades and I am sick of seeing new signs put up each year that close more and more roads and trails that have provided access to our land for several generations. The designated OHV routes on Map #2-54 shows a significant number of routes & trails for OHV use. Map #2-55 & #2-56 would lead one to conclude that nearly 90% of the existing routes & trails would be closed. SUCH ACTION, IF TAKEN, WOULD BE COMPLETELY UNREASONABLE & UNACCEPTABLE!	Please see general comment responses #10 and #19
Brian	Thorn	OHV Route Identification	PLEASE DO NOT ALLOW ANY ORV TRAILS TO BE ESTABLISHED IN EXISTING WILDERNESS STUDY AREAS. PLEASE ANALYZE CAREFULLY ANY PLANNED ORV ROUTE TO ENSURE MINIMAL IMPACT. PLEASE DO NOT DESIGNATE ANY ORV "OPEN AREAS"--ORV users need to stay on established trails to minimize impact. I've seen many areas destroyed by thoughtless ATV use.	Please see general comment responses #12 and #36
Brian	Thorn	Wilderness	I urge you to please strike a balance in favor of protecting what little roadless land we have left in this country. Many times I have been saddened when I've come upon the damage caused by uranium and oil exploration in the past. Will it never end until every square mile has been exploited? PLEASE PROTECT AREAS IDENTIFIED WITHIN AMERICA'S REDROCK WILDERNESS ACT FROM OIL/GAS EXPLORATION AND ORV USE.	Please see general comment responses #12, #36 and #101
Tom	Thorne	Minerals and Energy Resources	As you may predict, I am in favor of scaling back the level at which our public lands are impacted by extractive industries. I understand that the current draft plan contains terms that are extremely favorable to these industrial users. The USGS has provided estimates of negligible levels of natural gas and oil, where it exists in Utah. Merely exploring for these resources will negatively impact these fragile lands and most likely reveal that extraction is not economically viable. I would like to encourage the BLM to adopt a more compromising approach, and suggest adoption of what is proposed by the Castle County Heritage Plan. This plan would provide more of a	Please see general comment response #18, #35 ,#36 and #101

First Name	Last Name	Category	Comment	Response
			balanced approach to management of the land under consideration, allowing for resource exploration while protecting areas of great scenic, cultural, and recreational value. Thank you for your attention.	
Janice	Thorup	Process and Procedures	I grew up in Utah and I am against the Price Resource Management Plan draft alternatives. America's Redrock Wilderness must be preserved It belongs to all Americans and is part of the heritage we will leave our children. Please, instead, consider The Castle Country Heritage Plan which is reasonable and balanced.	Please see general comment responses #12, #35 and #36
Carl	Thummel	OHV Route Identification	More control also needs to be exercised over off-road vehicle use which continues to increase with little control. The ORV users deserve land to enjoy, but they should be able to share these resources with others	Please see general comment responses #15 and #19
Carl	Thummel	Wilderness	I urge you to consider wilderness alternatives to protect the Price BLM region. We have enjoyed our visits there over the years, but it has becoming increasingly apparent that commercial and recreational exploitation is having an impact on the land. The Castle County Heritage Plan would be an ideal solution to these problems. Alternatively, any effort you can make to increase wilderness protection for this region will be a step in the right direction.	Please see general comment responses #35 and #36
Alan	Timmerman	Minerals and Energy Resources	Rather than sacrifice these pristine lands to oil and gas development, I urge you to protect them from the irreversible harms that oil and gas drilling would surely cause.	Please see general comment response #18 and #101
Alan	Timmerman	OHV Route Identification	I also urge you to protect these lands from further damage from off-road vehicle activity.	Please see general comment responses #19 and #36
Ross	Tocher	Minerals and Energy Resources	Mineral leasing should be excluded from all the areas proposed for wilderness designation in the HR 1796.	Please see general comment response #101
Ross	Tocher	OHV Route Identification	Off-road vehicles should be excluded from the proposed wilderness areas.	Please see general comment responses #12 and #36
Lynna	Topolovec	Fire and Fuels Management	Next I would like to address chaining and burning. I feel that if an area of public land is to be chained or burned, that it should be first opened for wood harvesting for the public to gather wood for free, rather than wasting the natural resource.	Allowing wood harvest before fuels treatments is an issue to be addressed on a case-by-case basis during implementation of the RMP. In the past, such implementation projects that are near communities have been advertised and wood gathering opportunities have been made available.
Lynna	Topolovec	Minerals and Energy Resources	I am currently concerned with the number of gas wells that have been placed on BLM land and more importantly, the number of new roads that have been bulldozed. To me the government should be using a “leave no trace” option when it comes to the development of gas wells. I do not agree with the development of 50 foot roads to drive to 1 or 2 wells. It would be better for the environment as a whole if you would just have the roads built as one swipe with the blade dropped enough to remove shrubs and let that become the temporary road to the well. The natural environment has also been impacted with the amount of gravel used on the roads. Both the natural terrain and drainage areas have been heavily impacted by the current gas well development. If we review the type of erosion that can occur in this area, I would think that no disturbance to the land is the best policy.	Please see general comment responses #18 and #72
Lynna	Topolovec	Minerals and Energy Resources	I would ask that you take a serious look at the long-term effects of allowing drilling to continue with the current methods. I would implore you to prevent the large drill pad and wide road generation and minimize the cuts in the terrain. I have seen a great number of well pads that do not need to be the size that have been cut, as well as no reseeding, nor vegetation on the sidewalls of these cuts.	Please see general comment response #18. Specific measures would be developed through review and analysis of Applications for Permits to Drill.

First Name	Last Name	Category	Comment	Response
			Also of concern to me is the possibility of “flare-offs” at the well. With the area as dry as it is I would hope that a 24x7 watch team by the gas company would be in place in case of any fires on the site. I would also hope that any water extracted from the well would be contained in lined ponds with fences high enough to prevent wildlife from drinking the contaminated water. I would also hope that wells would be prevented from being placed close to a streambed or spring and that daily monitoring is put in place to avoid contamination of any water, as most of these waterways are the only water for wildlife.	
Lynna	Topolovec	OHV Route Identification	There is also a need to reduce off-road vehicle misuse of public lands. All vehicles should use designated roads and not be out destroying other property.	Please see general comment response #19
Lynna	Topolovec	Process and Procedures	The fees, for use of public land, are getting out of hand. It is my understanding that it is being reviewed that fees to go on any public land will possibly be implemented. I find this to be a second tax on a use that we are already paying for in our taxes. If this does go into affect, are you going to man your offices 24 x 7 to accommodate the public obtaining permits?	The fees collection and redistribution process is not decided by the Price Field Office and is not a decision made in BLM Resource Management Plans. Any changes to fee collection and revenue distribution policy would be implemented as appropriate under any of the alternatives considered in detail.
Lynna	Topolovec	Recreation	As a citizen and users of the land listed in the DRMP/DEIS, I would like to indicate that I am for a limited multiple use option, but not multi abuse of the land. I am not for a proposal that would only allow recreation where mineral development is located.	Please see general comment response #14
Lynna	Topolovec	Soil, Water and Riparian	Erosion is one of my greatest concerns in this area. In the Gordon Creek area, where some previous roads existed, deep gullies have formed due to lack of vegetation and the soil type. The reclamation of cuts in the terrain, for gas lines installation, has been lacking. Not only have non-native plants been seeded, but the vegetation is sparse even though the line was installed two year ago. I would suggest that more follow-up work be completed to validate that reclamation is actually being completed by anyone disturbing BLM land. With the likelihood of erosion on the new cuts of the proposed roads, I would hope that you would reject the maximum development proposal.	Reclamation of areas affected by O&G development is required by standard lease terms, which state in part: "To the extent consistent with lease rights granted, such measures may include, but are not limited to, modification to siting or design of facilities, timing of operations, and specification of interim and final reclamation measures. Prior to disturbing the surface of the leased lands, lessee shall contact lessor to be apprised of procedures to be followed and modifications or reclamation measures that may be necessary." The measures, modifications and specifications that address reclamation could include the use of only native species and bonds that require the reclamation efforts to be successful.
Lynna	Topolovec	Transportation and Access	I see a need to reduce the development road sizes from their current dimensions since there is minimal traffic in the area. The only thing that the expanded road would do is defacing more public land without any real or measurable benefit.	Recreational demands and opportunities have been carefully analyzed in the RMP/EIS. Project level decisions that require additional, site specific consultation and/or coordination procedures will be met as those projects move forward over time. Also see general comment responses #18 and #101
Lynna	Topolovec	Visual Resources	I can see that a 50 foot swath was cut from north Gordon Creek/Oman Field area all the way to the Pinnacle	Please see general comment response #134

First Name	Last Name	Category	Comment	Response
			Peak area. This cut has completely changed the pristine view of the area. The 50ft cut is massive in looks and does not appear to be reclaimable at this point. I would venture to guess that if the maximum development option is chosen, the same visual impact will occur at a greater magnitude. But the visual impact is not the only issue.	
Lynna	Topolovec	Wild and Scenic Rivers	I perceive that designation of W&SR would result in removal of private property if you where to implement the full scale Wild and Scenic river process.	Under the Wild and Scenic Rivers Act, designation of a river neither gives nor implies government control of private lands within the river corridor. Although Congress could include private lands within the boundaries of the designated river area, management restrictions would apply only to public lands. Private land owners would be able to use their property as they had before designation. The Act does, however, allow the federal government to acquire non-federal lands through acquisition of fee title, whether by purchase, exchange, donation, or another method, but not more than an average of 100 acres per river mile within the corridor (there are generally 320 acres in a river mile). If 50 percent or more of the river corridor acreage is in public ownership (federal, state, or local), acquisition can only be on a willing seller-willing buyer basis. A scenic easement may be acquired from land owners which, depending on the terms and conditions of the easement, may only involve the protection of narrowly defined visual qualities with no provisions of public use. There are no limitations on how many acres a scenic easement may be acquired for. Condemnation of lands as a last resort for the purpose of protecting Wild and Scenic River values is permitted under very limited circumstances. The federal government has rarely exercised its eminent domain powers with respect to Wild and Scenic Rivers and not since early implementation of the Act, when the attitudinal climate was one of federal acquisition.
Lynna	Topolovec	Wilderness	Wilderness study areas. These areas were supposed to be roadless and natural, with opportunities for solitude, however, it seems that in the Gordon Creek area, even the wildlife management areas are being taken over with roads and having a major impact on wildlife. It is my understanding that more deprivation permits were allowed because of the lack of planning on the food resources for the wildlife in those areas. Please take these areas into	Please see general comment responses #22 and #159

First Name	Last Name	Category	Comment	Response
			consideration in order to fix the problem.	
Elisabeth	Tredmell	Process and Procedures	Recently I became concerned about the damage to Utah's environment that will occur with oil leasing and development. Your wilderness will suffer and beautiful scenery devastated by ORV abuse. Please support the Castle Country Heritage Plan.	Please see general comment responses #18 and #35
Richard	Trevino	Minerals and Energy Resources	Geophysical surveys should remain under casual use guidelines because of their no significant impact standing.	Management actions for Alternative A, Alternative B, Alternative C, and Alternative D allow for geophysical operations consistent with existing regulations for geophysical exploration.
Robert	Trimble	Process and Procedures	I support the Castle County Heritage Plan, and I'll thank you right away.	Please see general comment response #35
Jobekah	Trotta	Minerals and Energy Resources	Please PROTECT the Redrock Wilderness Act from oil and gas leasing and drilling. Please do not allow companies to lease, explore for oil and gas, and ultimately develop these lands, ruining the stunning scenery of this unique area, degrading water quality, causing harmful soil erosion, endangering wildlife habitat, and destroying rare but essential riparian areas that should be protected. We all can make a difference in the choices we make today for tomorrow.	Please see general comment responses #36, #72 and #101
Jobekah	Trotta	OHV Route Identification	It is important that the BLM designate specific trails in the RMP, and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act – and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12, #19, and #36
Jobekah	Trotta	Process and Procedures	I am writing today to submit my comments regarding the Price Resource Management Plan draft alternatives and to endorse the Castle Country Heritage Plan. What price does the American Public have to pay to keep these areas protected against the commercial industry, and meandering tourists interest. There will soon in this century, be asking ourselves the question, "Why did we give these places away when there are alternatives that can be explored."	Please see general comment responses #1 and #35
Robbie	Trowbridge	Minerals and Energy Resources	Please protect from oil and gas development and excessive ORV use places like Sids Mountain, Mexican Mountain, San Rafael Reef, Wild Horse Mesa, and Desolation Canyon. The BLM has an obligation to the American people, not to the profit motivated corporations. Please remember this.	Please see general comment responses #18, #36 and #101
Kathleen	Turner	Process and Procedures	Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands.	Please see general comment response #35
Bob	Turri	OHV Route Identification	It is clear to me that your intent in this document is to eliminate, as much as possible, OHV use. Examples of this are: 1. 25 size limit on groups; 2.Limiting vehicles size to 10; 3. Requiring 108 day advance notification for a permit; 4.The large user fee required for group use; 5.The closure of many roads and trails; 6.The layering of special designation ; 7.Buffer zone creation . Limiting group size is a dramatic step that takes away our right to join with our many friends and enjoy OUR PUBLIC LANDS. There are certainly alternatives to this, such as following designated roads or trails, lunching at designated areas and strongly stipulating clean up. This can be	Please see general comment responses #19, #20, #37 and #81

First Name	Last Name	Category	Comment	Response
			monitor just as well as policing group sizes. You have not shown in your proposed plan that conditions are so drastic, that you must take this hard action at this time. Limiting group sizes is also impossible for us to accept. These types of actions tend to destroy our God given rights. Again as long as these vehicles stay on designated roads or trails, park in designated areas, and clean up after an event this should be considered a reasonable option. Again you have not convinced me that the current situation is such that you must revert to such stringent measures. Maybe sometime in the distant future these kinds of measures may become necessary, but not now. Group sizes above 25 are fairly common by all user groups. Requiring 180 days notice before we can get a group out on the Public Lands is truly unacceptable to our groups. So many times we gather our friends for a weekend ride on the spur of the moment. This makes us feel like we are being deprived of our rights, and our freedom, that has made our country so proud. I feel your efforts towards developing a good management plan has gone too far and is getting into our civil rights. The BLM is insistent on closing our roads and trails. Why? Use is growing very fast on the public lands. If BLM does not provide for this use, they will find they will have a much greater problem in the future than they now have. No user group is going to go away. It seems almost ridiculous to close an existing road or trail. In most cases the only damage occurred when the road or trail was constructed. If a road or trail is truly causing irreparable resource damage, then maybe we can agree to close it. You have said this type of damage exists but have not proven it. Just because you say so doesn't make it so. Not many years ago I sat in federal court and listen to BLM and some FS resource specialist testify that the marks left on Public lands by ATV use, is not damage, but only abuse. In the many days I have spent on Public Lands I have come to agree with the statements made, before a federal judge by your resource specialists. These specialists testified during a hearing where SUWA was suing BLM for not properly managing their WSA. Now, all we hear from the BLM is how OHV use is destroying our public lands. I have found a few areas of Public lands where use is resulting in some damage. They are only a few and are always very small. Perhaps the best solution to this is to allow that type of use to occur in that area. If it is shut down, the usual result is the use goes somewhere else. The use fees you are charging for use of the public lands should only be minimal, and they should apply to all users of public lands. It should not be intended that we help pay for all the law suites that BLM is experiencing from SUWA and other such groups. The fees that BLM has recently started to levy, called cost reimbursement, is totally out of line. We as the public have already paid your wages. We should not be required to pay you twice to do your job. The layering of designation is another practice that is common with the BLM. For the most part it allows BLM to impose stricter requirements on the user than is necessary. In fact it is a method that allows BLM to circumvent the intent of congress. It allows BLM to develop their own wilderness in spite of congress desires. This really needs to be looked into by congress, and we will forward letters to members of congress regarding this concern. This is one of the areas that add greatly to the confusion in interpreting your document.	
Bob	Turri	OHV Route Identification	A very serious problem that exists in your plan and will be a problem in the development of the Moab, and Monticello RMPs, as well, is the failure to develop a road and trail plan. It seems incredible that you close roads without a road and trail plan.	Please see general comment responses #15 and #19
Bob	Turri	Process and Procedures	I remember, at one time looking into the Environmental Protection Act, and seeing something about all such documents produced by Federal Agencies must be written so the common average citizen could understand what was being said. I challenge you to read this document and interpret the meaning... Examples of what I see are... This proposed plan never addressed a broad enough alternative base. If you look at the alternatives you will find a very narrow margin in those alternatives.	Please see general comment responses #2 and #123
Timothy and Judith	Tuttle	OHV Route Identification	We would like to know what the BLM intends to do with the Chimney Rock/Summerville Trail System as well as the Arapeen Trail connector routes. We understand the local OHV community submitted detailed route	See general comment responses #9, #20, #31 and #143.

First Name	Last Name	Category	Comment	Response
			information regarding these trail systems early on in the process, and are very disturbed to learn that these trails do not appear on any of the Maps in the Appendix. As you will agree, Mr. Johnson, public input is a critical component of BLM's lawful planning process. We object to the manner in which the OHV community's input is frequently ignored. Please correct this error by publishing a supplemental draft environmental impact statement that discloses which routes will be open under the BLM's preferred alternative. Additionally, please make note of our strong desire to keep all OHV routes open. At a time when OHV use is increasing in popularity it is unwise to drastically diminish the routes available for our use.	
Laurie	Tyler	Transportation and Access	As an aircraft owner and member of the Utah Back Country Pilots Assn. I would like to thank you for mentioning these airstrips in your RMP. Hidden Splendor, Mexican Mountain and the rest are favorite destinations for camping, hiking and just enjoying the beauty of Utah. It is very important to maintain these access points into the back country and also for emergency use. We members of the UBCP practice "leave no trace" use of these airstrips and the surrounding areas. We educate pilots with regard to safe back country operations. The airplane is a very low impact vehicle for access to the trailheads at the airports mentioned above. Thanks again for providing the use of these wonderful, scenic places to visit!	Please see general comment response #21
Robert	Tyler	OHV Route Identification	The trails we really enjoy and would like to see left open are as follows: Eagle Canyon Copper Globe Front and Backdoor North and South Coal Wash Horseshoe bend area and overlook. Open trails along the muddy creek wilderness Book cliff trails for hunting Swasy's leap trail open all the way to the river Devils racetrack Other trails I have not seen yet but would like to explore. I think there should be a balance for wilderness and ATV or Jeep access. We are all different and have different needs. You have a tremendous task, please consider all the comments carefully and make your choices wisely to help ensure a place for everyone!	Please see general comment response #19
Brad	Ullrich	Alternative Maps	And that is where the problem begins. Recently, in preparation for making comments on the DRMP I downloaded all 64 megabytes of the plan from the Price BLM website. A significant portion of those 64 megabytes consists of a variety of maps, some of which are maps of the OHV routes. MOST OF THOSE MAPS ARE INCOMPREHENSIBLE! There are three maps of OHV routes, Alternative A and B being on one map, Alternatives C and D having their own maps. What I want to know is how on earth am I supposed to comment on the DRMP after looking at those maps? They consist of some state and federal highways, and a muddied up bunch of squiggly green lines. What are the routes designated on these maps?	See general comment response #32. Map content in the RMP has been completed from BLM standard datasets and presented with the most clarity possible. The 8 1/2" by 11" format for the maps in the RMP creates a problem when detail rather than precision is needed for review. Routes in green are designated routes. The Proposed RMP has approximately 1,276 miles of designated routes. There are approximately 670 miles in the San Rafael motorized route area. The Price River area has approximately 606 miles of designated routes. All of these routes will allow unlicensed vehicles (OHV's). The designated routes in the RMP include routes for full sized vehicles, OHV's and Motorcycles. More detailed maps were available at the Price Field Office upon request.

First Name	Last Name	Category	Comment	Response
Brad	Ullrich	OHV Route Identification	There is no way to find out in the DRMP, and this quote from section 2.8.3 only serves to make one wonder just what does the BLM intend to do with the area managed by the Price Office: "OHV use will be allowed on designated routes in limited areas. It will not be allowed in areas closed to OHV use." Designated routes in limited areas! I would just start laughing at this if it wasn't so serious a situation. Looking at the maps and the alternatives, I have absolutely NO idea on how to make comments on this plan that make any sense.	Please see general comment response #20
Brad	Ullrich	OHV Route Identification	Is the virtual elimination of OHVs on BLM managed land where we are headed? We saw the tip of this iceberg with the Farmington, NM RMP and the almost total elimination of the "open" designation, and it has continued in the Farmington District with a muddled mess called the OHV route designation. Many months after the Farmington RMP was final, there is almost no progress on route designation. With a call to Rich Simmons, Wilderness and Recreation Manager for the Farmington office this morning I learned that the original route designation plan had been scrapped, and they decided to start with a completely different area than was originally planned. Rich did admit that it looks like they have been handed more than they can handle with the manpower they have, but is this any reason to possibly penalize OHVers by eliminating routes just because they can't map them? It appears that this is possibly what is going to happen in Farmington. And here's the real kicker in all this, I have absolutely NO idea if this is what is happening in Price because no documents seem to exist that I can make sense of.	Please see general comment response #19
Richard	Ulrich	OHV Route Identification	that the BLM will not designate every trail in the Price area a motorized road.	Please see general comment response #19
Jackson	Underwood	Cultural Resources	Nine Mile Canyon in Utah is a powerful natural landscape of red rock cliffs, and valleys. It also contains numerous prehistoric rock art sites and other significant archaeological sites. As a professional archaeologist, I would urge the BLML to disallow any drilling projects or any other projects that would indirectly or directly impact these valuable prehistoric resources. Indirect impacts (such as road building leading to increased vehicle traffic and vandalism) are often the most destructive in the long run. Please protect the valuable heritage resources in Nine-Mile Canyon from all impacts. It is a national treasure and it would be a national shame for drilling to proceed.	Please see general comment response #9
Tom	Unger	Transportation and Access	I read the draft plan in moderate detail. I did not see enough preservation of wilderness quality lands. I urge you to consider the Castle Country Heritage Proposal supported by SUWA. Finally, I am also a newly licensed airplane pilot. The idea of exploring southern Utah by air is what inspired me to take flying lessons. In all my hiking in southern Utah I have never been bothered by airplane use. The runways already exist and are a very small foot print by comparison to roads and off road vehicle trails. By their nature, airplanes are very limited in what they can carry into the wilderness. I would like you to keep existing landing strips open for recreational use. Continue to monitor impact from airplane use. Apply quota access to landing strips should impact become too great.	Please see general comment response #21
Jon	U-Ren	Recreation	I am writing with concerns over the proposed restrictions of motor use in Desolation and Grey Canyons. The ban on the use of motors when the Cfs is below 5000 cfs in this drought era is ridiculous. It might as well be 50,000 cfs. The use of motors of low cfs only enhances ones trip down Deso/Grey. It allows you to get down to Jack Creek. , past the swarms of mosquitoes and black flies, where you can then safely put away your motor and enjoy the rapids and splendor of the canyon. As a private boater I am concerned on the 90 motor trips a season.	Please see general comment response #34

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			Who decides who these allocations will be given to? Shouldn't everybody have the same right to bring a motor if they have one, not just to those that are financially well off and can afford to go out and buy a new 4 stroke motor?... Will you ban the use of 4-strokes when those are available after everybody changes and spends hard earned money on a 4-stroke?... Have you thought about the safety of your canyons guests if you ban the use of motors? What happens if someone gets injured in the middle of the canyon? When time is of the essence and someone's life is at stake a motor could be the difference between life and death. I strongly recommend that you do not implement the restrictions on motor use in the canyons. I believe that there is a need for motors and that your restrictions are wrong and unfair. Please feel free to use my letter and show it to the public.	
Jerry	Vaculin	Process and Procedures	As stewards of America's Public Lands, I believe the BLM needs to be very careful and deliberate in its interpretation of 'multiple use', and consider not only current wants and needs but those of future generations of Americans as well. Just as every square inch of public lands should not be set aside as wilderness, careful consideration (such as Scenic and Historic value and Environmental Stability) should be given before opening areas to industrial and OHV use. And the BLM's should never consider opening any area to any 'use' that it is not 100% capable of policing and enforcing responsible use.	Please see general comment responses #1 and #15
Jerry	Vaculin	Wild and Scenic Rivers	I would encourage the BLM to include Nine Mile (as well as Rock Creek) on the National Wild and Scenic Rivers System. I believe these areas to be too unique and have too great an Historic, Prehistoric, Cultural, and Scenic value to not have their preservation as a number one priority!	Please see general comment responses #25 and #27
Tom	Van Diepen	Transportation and Access	Thank you for listing the four airstrips in the Price RMP as continued use designation. Could you please also include Cliffdweller Flat in your plan? That airstrip is a very enjoyable place to go for hiking, exploring, and having a picnic. It needs little maintenance and fun and useful as a stop or a destination.	Please see general comment response #21
Taylor	Van Horne	Process and Procedures	I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act values and uses, including wilderness	Please see general comment response #36
Greg	Van Wagoner	Transportation and Access	Please reconsider closing or limiting my recreational use of the places I love and have used all of my life. I am not against paying a fair amount for this privilege of using this public land, as long as it is used to upgrade and protect it from the few that do not deserve to use the land. Please advise me of your intentions and let me know if I can help in preserving this opportunity for my grand children	Please see general comment response #10
MariLynn	Van Zandt	Transportation and Access	I am very disturbed that the Draft RMP seems slanted toward closing roads and trails which have been used for decades by the public to access public lands.	Please see general comment response #10
Michael	Vandeman	OHV Route Identification	Please provide ZERO access for vehicles, including ATVs and mountain bikes, except for on existing paved roads. We have already lost far too much wildlife habitat, and can't afford to lose any more	Please see general comment response #19
Michael	Vandeman	Recreation	"Every recreationist -- whether hiker, biker, horsepacker, or posey sniffer -- should not begin by asking, 'What's best for ME?' but rather 'What's best for the bears?'" Tom Butler. "Will we keep some parts of the American landscape natural and wild and free -- or must every acre be easily accessible to people and their toys? Mountain bikes' impacts on the land are large and getting worse. The aggressive push of mountain bike organizations to build ever-growing webs of trails poses serious problems of habitat fragmentation, increased erosion, and wildlife conflicts. As interest in extreme riding continues to grow, as trail networks burgeon, and as new technology makes it	Please see general comment responses #15 and #36

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			possible for ever-more mountain bicyclists to participate, even the most remote wild landscapes may become trammeled -- and trampled -- by knobby tires. The destruction of wilderness and the fragmentation of habitats and ecosystems is death by a thousand cuts. Will introduction of mountain bikes -- and their penetration farther into wilderness -- promote additional fragmentation and human conflicts with the natural world? Yes." Brian O'Donnell and Michael Carroll	
Michael	Vandeman	Recreation	"Some things are obvious: mountain bikes do more damage to the land than hikers. To think otherwise ignores the story told by the ground. Although I have never ridden a mountain bike, I am very familiar with their impacts. For the last seven years I have regularly run three to six miles several times a week on a network of trails in the Sandia Mountain foothills two blocks from my home. □ These trails receive use from walkers, runners, and mountain bikers; they are closed to motorized vehicles. Because I'm clumsy, I keep my eyes on the trail in front of me. I run or walk in all seasons, in all kinds of weather. I have watched the growing erosion on these trails from mountain bike use. The basic difference between feet and tires is that tire tracks are continuous and foot tracks are discontinuous. Water finds that narrow, continuous tire tracks are a rill in which to flow. Also, because many mountain bikers are after thrills and speed, their tires cut into the ground. Slamming on the brakes after zooming downhill, sliding around sharp corners, and digging in to go uphill: I see the results of this behavior weekly. □ I regularly see mountain bikers cutting off cross-country, even on steep slopes, for more of a challenge. They seem blind and deaf to the damage they cause. Admittedly, backpackers and horsepackers can cause damage to wilderness trails. But this is a poor argument to suggest that we add another source of damage to those trails." Dave Foreman "Studies show that bike impacts are similar to those of other non-motorized trail users." Jim Hasenauer (professor of rhetoric and member of the board of directors of the International Mountain Bicyclists Association)	Please see general comment responses #79 and #81
Michael	Vandeman	Recreation	Mountain bikers have turned to scientific research to try to make mountain biking seem less harmful, and in particular, to studies comparing it with hiking. Although they have interpreted this data as indicating that mountain biking impacts are no greater than those of hiking, a more careful look at these studies leads to the conclusion that mountain biking impacts are actually several times greater than those of hikers. Some of the important characteristics of mountain biking that have been ignored are: speed; distance traveled; the increase in number of visitors that bikes allow; increased trail-building, with its attendant habitat destruction; the displacement of soil (other than downhill); the killing of roots and soil organisms and ecosystems; most effects on wildlife; manner of riding (skidding, braking, acceleration, turning, and representativeness); tire tread; and noise (bikes are relatively quiet, but a rattling chain may be perceived as "alien" to natural surroundings). In addition, measuring techniques need to be described in more detail, "blind" measurements should be considered (where the measurers don't know what treatment they are measuring), controls need to be added, and "intangibles" (e.g. loss of feelings of safety and loss of the primitive feel of natural settings) need to be taken more seriously. The direct killing of small animals deserves attention. On the other hand, why do we need research to prove what is obvious? We don't need any research to know that	Please see general comment response #93

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			we shouldn't step in front of a speeding truck. Or mountain bike.	
Gerry	VanderBeek	OHV Route Identification	In order to preserve these essential natural qualities, I am urging you to limit ORV travel to the some 2500 miles of established motorized trails already open to ORV travelers in the Price BLM resource area. I therefore urge the BLM not to allow ORV or other motorized activity in the proposed wilderness areas as per the Citizens RMP Proposal in the Price resource area.	Please see general comment responses #12 and #36
Gerry	VanderBeek	Recreation	Strike a fair balance between motorized and non-motorized recreation	Please see general comment response #15
Chris	Vargas	OHV Route Identification	In all fairness the BLM must accurately disclose all changes that each alternative may make to the San Rafael Route Designation Plan.	Please see general comment response #20
Chris	Vargas	OHV Route Identification	The BLM should stick with the proven 50 vehicle limit and not impost National Park style management on public lands. I feel this is somewhat deceptive and the BLM must update their maps to accurately portray the OHV designations in each alternative to fully show the impact on access. The BLM should indicate how many miles of OHV routes on Map 2-56 are currently illegal for unlicensed OHV use. It is our greatest wish that all popular OHV trail systems remain open. We also request that designated links to the Arapeen Trail be established and that all the Chimney Rock/Summerville and Humbug Trail systems be left open.	Please see general comment responses #10, #19, #31, and #78
Frank	Vaydik	OHV Route Identification	I wish to voice my objections to designating all existing tracks open to motor vehicles. Keep some areas just for walkers. Do not open the majority of the area to ATV's by allowing them to use all existing trails, etc.	Please see general comment responses #19 and #79
Frank	Vaydik	Recreation	I both walk and ride an ATV in the Price area and I strongly believe that, when I walk, I should be able to do so without seeing or hearing ATV's; and in areas that do not have oil wells. That's why I walk! Please strike a balance between ATV, drilling and walkers. Please do not let slip away the opportunity to protect the beautiful lands of the Price Resource Area. Please give these special places and the Castle Country Heritage Proposal your full support. It's the right choice for our public lands.	Please see general comment response #14
Cherlyn	Vetere	Socioeconomics	Federal lands provide nearly a third of the nations natural gas supply. By imposing the radical restrictions of Alternative D, the BLM is failing to identify the negative impacts these restrictions will have on towns like Castle Dale, Price, and Green River.	See general comment responses #2, #18 and #132
Billy	Vigor	Socioeconomics	With out the oil and gas fields in Price and surrounding areas you would see a dramatic decrease in the economics of the area. The oil and gas companies bring careers to more than just the people employed by them, there are many service and sales careers that develop, because of the large amounts of money that is spent by the companies and there employees. These careers offer a wide variety of possible advancement for local individuals, some thing not available with coal mining and other local companies. The taxes that the oil and gas companies pay are unmatched by any one else. The royalties paid to land owners is another way that these companies bring more money into the community. Land that was once not good for much is now being used to improve the life style of hundreds or more people and is helping people such as farmers improve and modernize there farms so that in the future they will be able to stay competitive with other farming companies and be able to hand the farms down to future generations and keep a tradition around that is being threatened. These companies also donate time and money to many different charities and community projects. Thank You for your time.	See responses to specific comment 502 and general comments #2 and #132
David	Vikse	Minerals and Energy Resources	Please do not give these areas away to oil companies for development and short-term gain.	Please see general comment response #18
David	Vikse	OHV Route	Please keep areas proposed for wilderness under America's Redrock Wilderness Act off limits to Off Road	Please see general comment responses #12 and

First Name	Last Name	Category	Comment	Response
		Identification	Vehicles by designating specific trails where ORV use is appropriate these trails need to be clearly mapped posted.	#36
James	Viney	Minerals and Energy Resources	Please protect all areas within the America's Redrock Wilderness Act from oil and gas leasing and drilling,	Please see general comment responses #18, #36 and #101
James	Viney	OHV Route Identification	I think it is very important to not designate any ORV trails within any lands within America's Redrock Wilderness Act or existing wilderness study areas such as Sids Mountain.	Please see general comment responses #12 and #36
Janna	Voss	OHV Route Identification	I propose that the Bureau of Land Management designate specific trails for off-roading-vehicle use, that the trails be clearly mapped with clear signs on the trails, and that the trails be effectively enforced by law officials.	Please see general comment responses #15 and #19
Janna	Voss	Wilderness	I propose the preservation of wilderness lands, and that the wilderness lands be NOT offered to oil and gas development companies.	Please see general comment responses #36 and #101
Laura	Walker	Minerals and Energy Resources	Protect the Price, Utah Region by keeping out oil and gas exploration aid.	Please see general comment response #18
Paul	Walker	Process and Procedures	As a part owner of Utah's magnificent public lands under your jurisdiction, I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office -- and especially the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act.	Please see general comment response #36
Scott	Walker	Minerals and Energy Resources	I am writing to request that you do all in your power to STOP 'development of Utah wildlands for oil and gas drilling--this land is already developed naturally and is worth more to the State of Utah as a source of tourist revenue and natural beauty--the oil and gas companies will take what they want, make huge profits which will largely leave the state, and at the same time trash the wildlands for everyone, leaving only a mess in their wake as so many corporations have before them. This will hurt the people and wildlife of Utah far more than any brief financial gain to be had. Once the land is destroyed that is it, forever, and these companies have a terrible record of destruction that is well documented. Do the right thing, something your kids can be proud of, and stand up for this land and its animals and natural beauty--that is your duty, not to profit industries that are already among the most profitable in the world.	Please see general comment response #18 and #101
Scott	Walker	Recreation	But unmanaged and irresponsible off-road vehicle use has long threatened these spectacular wildlands. And now the Bush administration wants to open virtually all of them to oil and gas development -- and the accompanying roads, power lines, compressor stations and other industrial activities -- that would put an end to their wildness. The Bureau of Land Management has just released a draft land use plan that would open 98 percent of the area's wilderness-quality lands to oil and gas drilling. Under the plan, only 584,128 acres of the area would be closed to oil and gas leasing -- and almost all of these acres are already protected from leasing by Congress. In addition, the draft plan would close even fewer acres to ORVs, ensuring expansion of the spider web of routes and trails that have already caused extensive damage.	Please see general comment responses #12, #14 , #36 and #101
Scott	Walker	Wilderness	Central Utah is home to 2.5 million acres of magnificent publicly owned lands. Among the colorful canyons and awesome rock formations are the renowned San Rafael Swell, with its soaring and jagged eastern edge, and Nine Mile Canyon, with its world-famous archeological resources, located within the remote and wildlife-rich Book Cliffs. One and a half million acres of these lands, including such well-known scenic areas as Desolation Canyon, Eagle Canyon, and Sids Mountain, have been proposed for wilderness preservation in America's Redrock Wilderness Act, now pending in Congress.	Please see general comment response #36

First Name	Last Name	Category	Comment	Response
Lynn	Wallace	Transportation and Access	I am a private pilot and owner of a Cessna 180. I live in Provo, UT and use many of the remote landing strips located in your management area. Thank you for including four of the more popular remote landing strips in your plan. It is a wonderful asset for me and my family to be able to visit these landing strips in my bush aircraft. It would be very difficult to access these beautiful areas without being able to fly to and land at these remote sites. Doing so is a wonderful family activity to hike and camp with my children and grandchildren.	Please see general comment response #21
Lynn	Wallace	Transportation and Access	I have plans to visit more of the airstrips located within your management area now that my plane is flying again after the engine work was completed this summer. It would be a painful and disturbing set-back to see any of these strips closed.	Please see general comment response #21
Robert	Wallen	OHV Route Identification	While I support the current move to manage by Designated routes I believe over restrictions will cause a great loss to my ability to enjoy the lawful and responsible pursuit of recreational resources within your management plan. The BLM shift from open to limited areas for managing OHV use should begin by designating all currently existing motorized use roads, routes, and trails as designated routes, except routes with a confirmed purpose and need to limit access. Limiting that access should be to the smallest area possible and with a by-pass route provided to continue travel within the overall area. Closure should be considered only after attempts to mitigate and other management efforts are shown to be ineffective. Providing even more areas for only "quiet sports activities" at the cost of preventing other law abiding citizens the freedom of accessing America is not a valid purpose and need.	Please see general comment response #19
Gretchen	Walsh	OHV Route Identification	ORV users should retain access to the 2500 miles of motorized trails that are not in proposed wilderness areas, but should not be given any new areas.	Please see general comment responses #10 and #12
Bill and Shirley	Walsh-Weathers	ACEC	As just noted, we support the designation of the Nine Mile Canyon area as an Area of Critical Environmental Concern. Additional management preservation efforts are appropriate and desirable, because once cultural resources are lost or damaged they are gone forever... The Special Recreation Management Area Plan for Nine Mile Canyon, including the lower portion, should at least follow Alternative C. OHV traffic should be limited to present routes and not expanded into lower Nine Mile Canyon and Jack Canyon to preserve cultural resources, both known and yet-to-be found. The entire area deserves a Visual Resource Management classification of I, but present VRM II areas should not be lowered any further.	Please see general comment response #154
Bill and Shirley	Walsh-Weathers	ACEC	No doubt, managing more ACECs with adequate or status quo resources will be challenging, but we recommend Alternative C with 19 areas and more acreage over Alternative D with 15 areas. Our reason is that extra protection is warranted due to outstanding characteristics and the record should indicate that these areas are special. The value of included resources are remarkable and worthy of special protection. All these areas have multiple and valuable qualities, including but beyond, recreation and consequently, should be given ACEC status. We especially encourage preservation and protection for primitive and/or culturally rich areas such as Nine Mile Canyon, Range Creek, Gordon Springs, Spring Canyon, Nates Canyon, Buckhorn Draw, and Cottonwood Canyon. Despite the watering and magnesium chloride, the road has never been in worse shape in our memory. Developers should be held to stricter standards and they should be enforced...	Please see general comment response #30
Bill and Shirley	Walsh-Weathers	Minerals and Energy Resources	We do not always agree with BLM decisions, but we are troubled by BBC's apparent view that the BLM should abdicate their regulations, that it is appropriate for BBC to take actions involving other businesses that it could not hope to carry out under the rules, and that, when things didn't go their way, the course should be to charge that BLM personnel misled them with regard to an extension that had not even been applied for... We hope the Final Decision on this RMP will provide the means to manage lands in a balanced way that does not abdicate in the face of special interest pressure... As you know, we disagreed with the BLM's decision to approach gas and oil	Please see general comment response #9 and #18

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			development in the Canyon through a series of piecemeal Environmental Assessments (EAs). Removing the Price Field Office archeologist with the main responsibility and specialized knowledge of Nine Mile Canyon from commenting on gas development is hard to understand, unless perhaps industry pressure drove that decision. That decision should be reversed immediately. Even with the most qualified, experienced experts involved, mistakes and accidents can occur, possibly resulting in the loss of priceless resources and treasures for all time. The art and historical artifacts of Nine Mile Canyon continue to be in real jeopardy and we urge you to bring the most qualified staff member back to the task of helping you protect them.	
Bill and Shirley	Walsh-Weathers	OHV Route Identification	We have spent a great deal of time in the San Rafael Swell and have visited many areas and believe a balanced approach to resources requires that off road vehicle use in the Swell needs to be limited. We know ATV riders and understand the enjoyment they get from that recreational activity, but if reducing erosion, preventing further erosion, protection wildlife and what vegetation exists, etc, are also priorities, it's essential that strenuous efforts be made to ask ATV riders to confine their activities to areas already so impacted that reclamation is no longer possible. In studying the maps that are available in the draft RMP, it appears that some very important areas will remain closed to ATV use. For that we are grateful. However, our immediate concern relates to the fact that the draft RMP is not accurate. We have not yet been able to fully understand what has occurred, but it seems that what is presented as Alternative D (BLM preferred alternative), is really not your preferred alternative at all and in fact, the process that will be followed to come to a decision on issues related to OHV travel is operating independently of the draft RMP process, even though comment is to be submitted at this time. We spoke with a staff person in the Price Field Office to try to follow what has occurred and we believe she did her best to explain, but what we came away with is a sense that this particular section of the draft cannot realistically be considered to have benefited from public comment unless full information on Alternatives and impacts is disclosed and a separate comment period established.	See general comment responses #19, #20 and #143.
Bill and Shirley	Walsh-Weathers	OHV Route Identification	We therefore request that you withdraw the OHV issue (in whatever it consists of) from the current process and deal with it separately, including with a reasonable comment period. We request that a full set of maps be made readily available at that time, including a map of existing designated ATV routes, along with maps of the various proposed changes/Alternatives. These maps should be coupled with the written discussion and available at the PFO website, rather than somewhere other than at an unrelated website - www.atyourleisure.info.	Please see general comment response #20
Bill and Shirley	Walsh-Weathers	Wilderness	We recommend that no drilling for gas and oil be allowed in Wilderness Study Areas and that they remain primitive and as roadless as possible. Lands with wilderness characteristics should also be protected - at least until Congress decides which additional areas shall be designated wilderness.	Please see general comment response #36
Joyce	Walton	OHV Route Identification	It is my wish to express our feelings on ATV and OHV us in the San Rafael Swell. Please don't lock us out of our natural resources. We take great pride in being responsible users. The San Rafael area is a wonderful natural resource and one that should be enjoyed by all. It is big enough to accommodate all types of recreation without ruining it for others. Yes we've been to Slipper Arch and Sinbads Wall etc. etc. and we love taking other people there with us. Yes we've viewed the desert big horns in December. How else would we be able to see all of this if you close out the ATV's It's to far to walk in a day, and not everyone can have horses. Our family spends a lot of time in this area, and we do take on the responsibility of use. Give us some teeth to help!!! The state of Utah has a 24-hour Poachers line we would like to see a 24- hour ATV abuse line. We spend a lot of money studying and planning, let’s spend a little on enforcement and give the responsible users some tools to help. I don't see a bunch of John Waynes running around telling other riders what they can and can't do, but if we had a resource to report abuse, cell phones work in most of the Swell, and others know that abuse can and will be prosecuted, then maybe we increase the number of responsible riders, and minimize the irresponsible acts of normally responsible	Please see general comment responses #10, #15 and #20

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			people.	
Rose-Marie	Walton	Minerals and Energy Resources	I also think that all the areas within America's Redrock Wilderness Act should be protected from oil and gas leasing and drilling. It is an extremely destructive process and doesn't yield enough energy to make it at all reasonable. It is important that the BLM designate specific trails in the RMP and that the environmental and social impacts of these trails are minimized and fully analyzed in the environmental impact statement.	Please see general comment responses #36 and #101
Rose-Marie	Walton	OHV Route Identification	I am writing about the Price Resource Management Plan draft alternatives, specifically the Castle Country Heritage Plan. I approve of this plan because it protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. The alternatives described in the draft Price RMP don't do either of these things.	Please see general comment responses #2, #12, #19 and #35
Rose-Marie	Walton	OHV Route Identification	Further, the RMP should not designate any "open areas" where ORV use is allowed without limitation. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain. Thank you for your time.	Please see general comment responses #12 and #36
Gary	Ward	Minerals and Energy Resources	I wish to express my concerns regarding the proposed drilling and oil exploitation as well as the proposed off road use in Utahs' San Rafael Swell. As dependent as we seem to be on off-shore oil, I find it more important to leave to future generations places of beauty and recreation with low impact on the lands.	Please see general comment response #18 and #101
Gary	Ward	OHV Route Identification	I own an off road vehicle (83 Toyota Land Cruiser) and know the kind of damage that can be done by it. Imagine if you will driving through a park in your neighborhood after a heavy rain. I hope you get a good visual with the mud flinging, the grass flying, and the vehicle sliding. Sounds like fun! Until you look at the damage you've done. There are already places to go to get that kind of action. LET'S NOT OPEN UP MORE OF OUR PROTECTED AREAS TO THAT KIND OF ABUSE!	Please see general comment responses #15 and #19
Tory	Ward Killian	OHV Route Identification	A) Emery County is concerned that no trail systems are mentioned in the DRMP. We feel that because the DRMP lacks a Route Designation Plan (Travel Plan), if we allow the BLM to make land use designations without a Travel Nan, we may lose hundreds of miles of motorized routes. We would like the BLM to open all existing roads and trails until all trail systems can be established. During this process, we suggest no Areas of Critical Concerns "ACEC" and Recreational Opportunity Spectrum Non Motorized "ROS-NM" be considered until all trail systems are established. We want the BLM to recognize all inventoried roads and trails and we want them to designate the entire inventory as open. When the Travel Plan process begins, EC suggest the BLM uses local OHV groups in designing and maintaining motorized trail systems. Trail systems are a very important management tool and have proven successful in other areas such as the Arapeen Trail System, Piute Trail System and The Great Western Trail.	Please see general comment response #19
Tory	Ward Killian	OHV Route Identification	A) A point of Confusion is that the DRMP mentions trail heads but no trails are designated open through the process of Route Designation. Emery County believes that all designated roads and trails should remain open to OHV, 4-Wheel and Single track use. There are several trail systems that have been submitted to the BLM that was inadvertently left out of the DRMP. EC suggests that the BLM recognize the Chimney Rock and Summerville trail system and also the proposed Arapeen San Rafael Trail system. (Mark H. Williams and Wade Allinson said they have submitted these trail systems to the BLM).	See general comment responses #19, #20 and#31.
Tory	Ward Killian	OHV Route	A) Emery County would require the BLM to hire an OHV specialist and other staffers that have an interest in OHV management to properly manage this very popular sport. The BLM states that OHV management is a top priority	Please see general comment response #89

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		Identification	for their Management Area, yet nobody on their staff is involved in motorized recreation.	
Tory	Ward Killian	OHV Route Identification	D) It is very important for the BLM to keep Connecting and Loop roads & trails open. Connecting roads and trails help lessen the impact on the surrounding area. For example, the Copper Globe road makes a loop, yet is closed off. It would make sense to make a loop and not have to turn around at the sight of the closure.	The Copper Globe road was considered in the San Rafael Route Designation Plan of 2003. Because the San Rafael Route Designation Plan is recent and it was prepared with public input and analysis, and there have not been changes in circumstances and conditions that require reconsideration of the plan, it is common to all alternatives with the exception of Alternative E. Alternatives are considered for the Price MFP portion of the planning area. Modifications to route designations will be considered on a case-by-case basis as activity level travel management plans are prepared.
Tory	Ward Killian	OHV Route Identification	A) The Junes Bottom Road and Short Canyon Road need to be reopened. Junes Bottom was a popular 01W trail been used traditionally for years. The Short Canyon Road outside of Ferron is a great Loop Road and would be good for OHV use.	Please see general comment response #20
Tory	Ward Killian	OHV Route Identification	Emery County would encourage to the BLM to provide separate trails for OHV use and Mountain Bikers to prevent problems that may arise when both groups are sharing the trail. Many times Mountain Bikers are allowed into primitive areas where OHV use is not allowed. Therefore we maintain that Mountain Bikers should have their own trail systems.	See general comment responses #19 and #79.
Tory	Ward Killian	OHV Route Identification	On Page 4-483 under "NON-WILDERNESS LANDS WITH OR LIKELY TO HAVE WILDERNESS CHARACTERITICS" it states "The presence and noise of OHV use of designated routes in all of the remaining non-WSA lands with wilderness characteristics would have a temporary adverse impact on opportunities for solitude and primitive recreation. Limiting motor vehicle use to designated routes, however, would minimize disturbances of adjacent lands protecting the natural character of these areas. No routes would be designated for OHV travel in Devils Canyon, Hondu Country, and Mussentuchit Badlands, and there would be no impact of OHV travel in these areas.	Section 4.2.11 in the Proposed RMP/Final EIS is an expanded analysis of potential impacts on wilderness characteristics on non-WSA lands. Table 4-7 compares the acreage of the OHV management classes for each of the non-WSA lands with wilderness characteristics and the analysis states the number of non-WSA lands with wilderness characteristics areas that would be affected by OHV use. Also see general comment response #12.
Tory	Ward Killian	OHV Route Identification	Emery County will simply not allow designated roads and trails closed to any motor vehicle use in Devils Canyon, Hondu Country or the Mussentuchit Badlands area. These roads and trails have been used traditionally for years. There are already thousands of acres of land in WSA's that can provide for solitude and a primitive experience. If we allow the BLM to start closing designated roads and trails for this reason, it would give the BLM the opportunity to close even more roads and trails in the Swell.	Please see general comment responses #12 and #20
Tory	Ward Killian	Recreation	BLM and Emery County's goal should be to manage Dispersed Camping in an environmentally sustainable manner so that future generations of Emery County residents may enjoy this activity as we have. The ideal is to accommodate this popular activity while addressing resource impacts.	Please see general comment response #81
Tory	Ward Killian	Recreation	Identify areas where local communities may post information regarding where goods and services are available in adjacent communities.	The issue of the BLM providing areas where local communities can post information regarding where

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				goods and services are available in adjacent communities would be addressed through activity level planning and is not an RMP level decision.
Tory	Ward Killian	Recreation	Identify and map roads and trails that tie to adjacent communities where food, lodging, fuel and other goods and services may be found.	The Proposed RMP includes a route designation plan for the Price Field Office, incorporating the existing San Rafael Route Designation Plan. Actions that specifically identify commercial opportunities such as food, lodging, fuel and other goods and services will be determined through activity level planning. However, an action common to all alternatives is that commercial activities would be directed to communities along the routes and that the BLM would work with local communities and other groups to foster heritage tourism throughout the Price Field Office area.
Tory	Ward Killian	Recreation	Emery County is opposed to all Special Recreation Permits. We feel that it will limit the economic and cultural values of dispersed camping in Emery County. But we also recognize that the BLM may require Special Recreation Permits in certain areas. If this is the case, the application process should be made as streamlined as possible (within 3 working days of permit request) so that large groups may be able to camp in appropriate areas.	Please see general comment response #81
Tory	Ward Killian	Recreation	Goal: Provide a reasonable range of access opportunity to see the backcountry by youth, the aging population and the physically handicapped. 1. The County, in cooperation with land managers will develop maps that identify Dispersed Campsites and Dispersed Camping areas that can be accessed easily by those with a physical challenge. 2. Where appropriate, facilities should be constructed that are disabled access friendly.	See general response comment #80. Under all alternatives, the RMP would provide a great diversity of opportunities and experience for recreation users regardless of skill or ability level. Recreation facilities are generally constructed to meet Universal Access Standards to the degree possible without changing the nature of the site experience.
Tory	Ward Killian	Wild and Scenic Rivers	Emery County believes that designation of any "Wild or Scenic" rivers or washes would have a negative impact on recreation with in the Price Field Office area. Emery County will take a no "Wild and Scenic River" stand on rivers and washes within the Price Field Office area. For example, designation of "Wild & Scenic" for Coal Wash both North and South is not appropriate. There is no value of water that runs through Coal Wash.	See general comment response #88
Gregg	Wardrip	Wilderness	I understand that the Bureau of Land Management has released a revised management plan for the area that would open 98 percent of wilderness-quality lands outside of existing wilderness study areas to oil and gas drilling. The revised plan does not adequately protect the land against destructive off-road vehicle use.	Please see general comment responses #12, #36 and #101
Jim	Wark	Transportation and Access	I am writing to comment on the Price Office Resource Management Plan. Specifically with regard to backcountry aircraft use, I am supporting Alternative D.	Please see general comment response #21
Jim	Wark	Transportation and Access	I have been using the airstrips in this area since 1990, principally, Mexican Mountain, Hidden Splendor and Cedar Mesa, averaging three to four trips a year from my Colorado home. I consider it a great, almost sacred, privilege to be able to do so. All pilots I know who visit these strips share this same reverence. I can truthfully say that in	Please see general comment response #21

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			what must be about fifty visits to these places I have never seen a trace of anything but foot and tire prints and some charred wood. I have transported many folks to Mexican Mountain who would never have been to this wonderful place by any other means. Is there a more environmentally friendly way to get to these places? I think not - even driving a vehicle to a trailhead has more impact - both in noise and footprint. I realize that the pilots and passengers who use these strips are a very small voice in the overall visitor population and they have no advocacy support outside of their fraternity. Visitors on horseback are probably a similarly small group, but with a greater impact. Would anyone consider excluding them? Are these hazards associated with using these strips? Certainly, but no more than by any other means of access, including hiking. As I perceive it, these strips require no maintenance expense by BLM. Is there any other group of public users who volunteer time, money and effort equivalent to that offered by the Utah backcountry pilots group? Is use by aircraft compatible with use by others, such as hikers? Let me relate an anecdotal experience: I was setting up camp at Mexican Mountain when a lone hiker came down out of Spring Canyon. He was hot, thirsty and tired looking. He seemed so annoyed at seeing me and the airplane that he refused my greeting - until I offered an ice cold drink. We sat together and had a great discussion, and I like to think I made a friend. I am 73 years old and would not want to hike into the Mexican Mountain airstrip - but it's a wonderful place to take short hikes from. At my age and with my flying days nearing an end, your decision will have little effect on me, but it is hard for me to accept that this recreational opportunity will be denied to future generations. These strips are also a part of the rich history of the public lands of Utah. I never go here without a realization of this history and a feeling of gratitude toward those who came before. These were courageous, hard-working men and women who deserve to be remembered both in story and in place.	
Jim	Wark	Transportation and Access	The visits to these airstrips has been an important part of my life and the memories that I have from these places are priceless. Believe that my eyes are moist as I close this, and thank you for the opportunity to comment.	Please see general comment response #21
Thomas	Wark	OHV Route Identification	Please do not allow this to happen in Utah wilderness where my family and I have spent countless hours of blissful hiking, camping and photography! The BLM must designate specific vehicle trails in the RMP, and assure that the environmental and social impact of these trails are minimized and fully analyzed in the environmental impact statement. Further, the RMP should not designate any 'open areas' where ORV use is allowed without limitations. I also urge you not to designate trails for off-road vehicles on lands within America's Redrock Wilderness Act - and particularly not in existing wilderness study areas like Sids Mountain.	Please see general comment responses #12, #19 and #36
Thomas	Wark	Process and Procedures	I urge you to enact the Castle Country Heritage Plan. The Plan is a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development	Please see general comment response #35
Christopher	Warren	Minerals and Energy Resources	Please help protect our natural heritage by keeping gas and oil interests out of areas like Desolation Canyon. To permanently disfigure the landscape for negligible resource culling will be a tremendous and irreversible waste of the resources.	Please see general comment responses #18 and #101
David	Warren	Minerals and Energy Resources	I also urge the BLM to protect all the areas within America's Redrock Wilderness Act from oil and gas leasing, drilling and industrialized developments. The oil and gas supply that may be gained from these activities is minimal. The potential irreversible damage these activities will inflict is huge. It makes no sense, in my opinion, to jeopardize these incredibly beautiful and ecologically diverse lands for short-term profits benefiting such few people. Other areas that should also be off limits to oil and gas include: The Labyrinth Canyon corridor,	Please see general comment responses #36 and #101

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			Desolation Canyon roadless area, including Nine Mile Canyon, Horse Bench, Maverick Canyon, upper Rock House Canyon, Pinnacle Canyon, South Franks Canyon, Christmas Canyon, Rabbit Valley and the Big Horn Benches.	
David	Warren	OHV Route Identification	Unregulated ORV use has taken a huge toll on the wilderness quality lands in your district. I urge you to protect the most special and sensitive areas from them. There should be no routes within WSA's and other lands within America's Redrock Wilderness Act. These are areas that contain amazing scenery, valuable wildlife habitat and rare archeological sites. Other areas I strongly feel should be protected include: Chimney rock and it's riparian zones and wildlife habitat; behind the reef- one of the most awesome and heavily used hiking areas in the Swell; The Price River proposed area and the San Rafael Knob, which is an area highly valued by hikers and other non-motorized recreationists. The Castle County Heritage Plan offers 2,900 miles of motorized routes while still protecting the most special wilderness quality lands.	Please see general comment responses #12, #31, #35 and #36
Brent	Watson	Transportation and Access	The impact to the land is very low using aircraft to access these locations. Since the wheels on an aircraft are not powered, they cannot dig into the ground like a truck or ATV can. It is also not possible to leave the airstrip with an aircraft. The wings are too big! I encourage you and the BLM to continue to provide access to public lands via aircraft. There are many airstrips within the price area that provide a one-of-a-kind resource for folks like me. Please continue this access.	Please see general comment response #21
Paul	Watts	OHV Route Identification	We would simply like to see a more balanced approach to the problem. An approach which considers all uses and users of our public lands. A more reasonable approach would be to restrict ORV use from environmentally sensitive areas and to do so with a clearly marked, easily understood, and enforceable signage.	Please see general comment responses #15 and #19
Ken	Weeks	OHV Route Identification	I am of the opinion that this area should be preserved in as pristine a form as possible and not opened up to more motorized transportation than is already available, and I would hope that the BLM can resist the pressures applied by this administration to put extraction and other destructive values above protecting this great national heritage.	Please see general comment response #19
John	Weiss	OHV Route Identification	I am the president of the WTA and their Rep. for the San Rafael, Dick Brass Trail System & particularly the Five Miles of Hell Trail. I submitted a request to adopt the FMOH Trail last year, with your office, but haven't received a confirmation. We still want to adopt the trail and hope you will grant us approval to do so. Several of us rode it last spring to assess needs and report to you, which I did. I haven't received any communication from your office, in that regard, either. I understand you've been busy with the Draft Environmental Impact Statement (DEIS) and Draft Resource Management Plan (DRMP) for the new Resource Management Plan. It appears to contain some of the most restrictive recreation management efforts outside a National Park. This is the main reason I'm writing to you now. Please consider our concerns below: 1.. We'd appreciate a complete disclosure of the management 'layers' which will restrict OHV travel and access, as well as all changes that each alternative may make to the San Rafael Route Designation Plan. We oppose all the management 'layers' outlined in the draft plan. 2.. There's no justification for the kind of group size limits proposed in any of the alternatives. The BLM should stick with the proven 50 vehicle limit and not impose National Park style management on public lands. 3. Your maps need to be updated to accurately show the OHV designations outlined in each alternative… Please know that we as part of the recreating public, will not tolerate overly restrictive management efforts. 5. All the popular OHV Trail Systems	Please see general comment response #19, #20, #32, #37, #81 and #124

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			need to remain open.	
Joseph	Weixelman	Cultural Resources	I wish to relay to you my comments regarding the Price RMP draft alternatives. Essentially, I feel that it fails to sufficiently protect Nine Mile Canyon - an important archaeological resource for the nation and a sacred land for Pueblo Indians. I am concerned that the preferred alternative leaves the Canyon open to additional industrialization... I strongly believe that drilling must not be allowed in the lands surrounding Nine Mile Canyon.	Please see general comment response #9 and #154
Joseph	Weixelman	Process and Procedures	As an alternative, I endorse the Castle Country Heritage Plan. This plan presents a balanced approach that protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATV's, dirt bikes and other off-road vehicles. It also includes reasonable opportunities for these activities to take place. None of the alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment response #35
C. Jameson	Wells	Minerals and Energy Resources	Oil and gas development would ruin this as well as severely damage the ecology, for only a very small return in energy.	Please see general comment response #18
Lee	Wentz	Minerals and Energy Resources	Please leave these untouched areas alone. We do not need to ruin them as we have so many other areas of the US in search of oil and gas. We need to have a few areas that haven't been spoiled by man.	Please see general comment response #18 and #36
Kate	West	OHV Route Identification	I recently wrote you to thank you for improving protection for land from ORVs in the Price Management Area. I think I was premature. Under the RMP, no protection for cultural sites, riparian corridors, or delicate desert soil is made.	Please see general comment response #19 and #72
Tom	Wheatley	OHV Route Identification	Designate off-road vehicle trails outside of the areas contained in America's Redrock Wilderness Act.	Please see general comment responses #12 and #36
Jeanne	Wheeler	Minerals and Energy Resources	It is an inaccurate interpretation of the BLM's own "multiple use" mandate to make oil and gas developmental priority over all other values.	Please see general comment responses #1 and #99
Jeanne	Wheeler	Process and Procedures	The Price RMP must also strike a balance between allowing for access routes and ensuring protection of fragile habitat and cultural resources. Specifically the BLM should craft a reasonable balance between motorized and non-motorized travel; include an effective trail enforcement plan; restrict ORV use from wilderness study areas, BLM-inventoried wilderness lands, and areas proposed for wilderness designation under America's Redrock Wilderness Act; and restrict ORV use from critical wildlife habitat, riparian areas and wetlands, and other fragile ecosystems.	FLPMA requires RMPs to be multiple use plans. 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. Alternative E would protect all lands with wilderness characteristics. Additionally, not all areas would be open to all types of uses in the planning area and 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 while providing for an acceptable level of OHV use. Also see general comment responses #12 and #36.
Jeanne	Wheeler	Wilderness	The BLM's plan should be revised to more effectively protect proposed wilderness and more equitably assess the value of the varied uses of public lands, including non-destructive recreational uses.	Please see general comment response #36 and #120
Virginia	Wheeler	Minerals and Energy	I am writing to ask the BLM to protect citizen proposed wilderness areas. Do not offer these areas to oil	Please see general comment response #101

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		Resources	companies for development.	
Virginia	Wheeler	OHV Route Identification	Designate specific trails where ORV use is appropriate and to protect all other public lands	Please see general comment response #19
Virginia	Wheeler	Wilderness	Protect these areas for future generations.	Please see general comment response #36
A. E.	White	Wilderness	The Bureau of Land Management (BLM) has released a revised management plan for the area. The agency has abandoned any pretext of balance. Instead, it proposes to open 98 percent of wilderness-quality lands outside of existing wilderness study areas to oil and gas drilling. In addition, it again refuses to adequately protect the land against destructive off-road vehicle use.	Please see general comment responses #12 and #36
Ann	White	Minerals and Energy Resources	I am all for multiple use land for hiking, fishing, hunting and other recreational activities as well as to earn a livelihood. I am not however, in favor of oil companies and other such drilling and digging operations impacting the wilderness areas. Although such excavation may initially or eventually bring in money to those communities it will actually jeopardize the long term ability of that area (such as a small town as Kanab) to continue to develop a viable economy through tourism. The natural beauty is all around us and especially in the wilderness areas. We have already lost too much of our wilderness area through 'development'. The natural beauty is God given to us, it is our responsibility to appreciate it and to preserve it for our children and their children, etc.	Please see general comment response #101
Patrick	Whiting	Minerals and Energy Resources	What is going on with the BLM Price Resource Management Plan? Why are these pristine precious lands being whored away? Is the cost of natural and archaeological treasures not important? And for what, the useless drilling of oil and gas? These lands NEED to be protected. They have to be protected. Oil companies come and go, but the beauty of these lands do not. If these places are destroyed there's no bringing them back, no matter how much plaster you want to use. Why must you drill in Nine Mile Canyon if it's possible to drill outside of it and avoid devastating what remains of our ancestors? I ask you Floyd Johnson, WHY? What's wrong with preserving beauty? There's no excuse for destroying what took eons to create for a small meaningless pleasure. I've been to these places that are potentially going under the knife of these purposeless money mongering fools.	Please see general comment responses #18 and #36
Patrick	Whiting	OHV Route Identification	These lands cannot be given up to the off-road vehicle companies either. They have no regard for these lands either. They simply want to drive where ever they want. It's not only devastating to the environment, but it's potentially dangerous to drive where roads are not established; which does not mean that more roads should be established. There are more than plenty of pre-existing places to ride, there does not and should not be anymore. Just because these lands are for sale, does not mean that we have to sell them.	Please see general comment response #19
Bonnie	Whitney	Wilderness	I think that nine million acres should be set aside as wilderness, no doubt we need oil and gas, but we need to protect the natural wonders, and our wildlife. I think it would be wonderful for our future generations to be able to enjoy the beauty of our great wilderness and trails.	Please see general comment response #36
Prudy	Widlak	Minerals and Energy Resources	This acreage MUST be protected for the enjoyment of future generations from the destruction of oil and gas development.	Please see general comment responses #18 and #101
Prudy	Widlak	OHV Route Identification	This acreage MUST be protected for the enjoyment of future generations from the ravages of off-road vehicle use.	Please see general comment responses #12, #19 and #36
Prudy	Widlak	Wilderness	I feel the BLM management plan, as proposed, is not in the public interest. At the very least, the management	Please see general comment response #12, #36

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			plan must provide protection for the 1.5 million acres of wilderness-quality lands that are covered by America's Redrock Wilderness Act. This acreage MUST be protected for the enjoyment of future generations from the destruction of oil and gas development and the ravages of off-road vehicle use. I urge you to alter the draft plan to include more meaningful wilderness protection.	and #101
Ross	Wilberg	Livestock Grazing	Grazing on BLM administrated land has historic precedence and should be recognized as such. It fits the multiple use, sustainable yield principle endorsed by Emery County's General Plan... When other resources (livestock grazers) are impacted by oil and gas exploration or development, loss of forage should be mitigated until such time as the surface area is rehabilitated... Any change in Animal Unit Months (AUMs) should be justified by sound scientific data... Historic use is being impacted by "new" user groups... The multiple use, sustained yield principle needs to be adhered to.	Please see general comment responses #33 and #83
Ross	Wilberg	Livestock Grazing	User conflict is increasing on the Mexican Bend trail. Cattlemen are having trouble when trailing cattle up out of the bottoms and meeting hikers, who unintentionally and unknowingly push the cows back down the trail. An alternative trail or temporary closure to hiking should be considered.	Livestock trailing and recreation on the Mexican Bend trail are both acceptable uses in the area. Site-specific trailing conflicts can be best addressed at the implementation level through coordination with other users, i.e. the trail could be temporarily signed to give notice that cattle will be on the trail during specified dates. However, resolution of this conflict is beyond the scope of this RMP since reallocation of the area for grazing or recreation is not required.
Ross, Clay and Wes	Wilberg	Livestock Grazing	Activity level planning (pond development) is sometimes hindered to the point where it's almost impossible to get accomplished, especially with Wilderness Study Areas. It appears that other uses, such as oil and gas development get preferential treatment. When other resources (livestock grazers) are impacted by oil and gas exploration or development, loss of forage should be mitigated until such time as the surface area is rehabilitated. Public meetings held to gather input are difficult to attend in the summer season when agricultural activity is at its highest. Meetings scheduled in the winter would possibly be attended better by those interested in grazing and agricultural interests. Any change in Animal Unit Months (AUMs) should be justified by sound scientific data.	Please see general comment response #33
Ross, Clay and Wes	Wilberg	OHV Route Identification	A route designation plan needs to be established for the Price River management area which recognizes historic roads. (Specifically the road into Prickly Pear and Pine Canyon.) Enforcement of the plan is critical. Camping areas for Livestock Grazers need to be determined under administrative use along with use of roads and trails. User conflict is increasing on the Mexican Bend trail. Cattlemen are having trouble when trailing cattle up out of the bottoms and meeting hikers, who unintentionally and unknowingly push the cows back down the trail. An alternative trail or temporary closure to hiking should be considered. Historic use is being impacted by "new" user groups.	In the Proposed RMP/Final EIS Section 3.6 acknowledges that ranchers and livestock permittees may also be facing increasingly stressful social situations as they try to balance their traditional lifestyles with demands from other public land users (e.g., oil and gas development and recreationists). Section 4.3.2 states that recreational activities would affect livestock grazing through direct human disturbance and indirect rangeland degradation. These effects could include animal displacement, harassment or injury. Adjustments in grazing or recreation decisions would be made at the site-specific level following analysis for livestock permit renewals or to reduce specific recreational conflicts with livestock

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				management.
Ross, Clay and Wes	Wilberg	Process and Procedures	Historic resource use such as grazing has evolved to a manageable and practical use of a renewable resource. There has been over use and unmanaged use in the past, but current management practices are viable. The attraction of "the West" is creating user groups that are opposed to historic use simply because it doesn't conform to their ideas of proper use. The multiple use, sustained yield principle needs to be adhered to.	Please see general comment response #1
Craig	Wiley	OHV Route Identification	In addition there appears to be very poor and less than accurate mapping of designated open trails such as the Chimney Rock – Summerville Trail System. I believe this deception to be out of design. Your responsibilities should include honest representation to all citizens and you need to be upfront with our rights and options.	Please see general comment responses #20 and #31
Craig	Wiley	OHV Route Identification	I'm also questioning your rationale thinking regarding licensed and unlicensed OHV vehicles and the restrictions you have proposed and have placed on many trails. The restrictions can't be based on safety due to the limited traffic. It can't be based on speed due to the inherent nature of the "licensed" enduro-type-bikes, generally speaking, which are much faster. It can't be based on noise and damage to the environment. Most licensed dirt-type motorcycles resemble chainsaws and have more off-road capability. I'm having a difficult time understanding why you have given acceptance to enduro type bikes, Jeeps and etc just because they are licensed. Most of the damage that I have witnessed has been caused from these types of vehicles (licensed) whether pulling horse trailers or operating independently. Most licensed OHV like the motorcycles, due their inherent design, have a tendency to be a bit more aggressive. Once again, I'm uncertain why a licensed OHV would gain acceptance with their negative attributes of noise, access to terrain and the safety issue that is associated with greater speed. ATV's like 4-wheelers are more limited on where they can travel and usually, have a tendency to be more dependent on existing roads and trails and more friendly to the environment. You have an obligation to make rules and regulations that are reasonable, rationale and rules that are easy to understand in order to insure compliance. The rules cannot be overly restrictive and impossible to understand.	Please see general comment responses #78 and #79
Craig	Wiley	OHV Route Identification	I oppose all of the management layers that you have outlined in your draft plan. I believe that we need more trails open to dilute overuse. The Chimney Rock, Summerville and Humbug trails need to be left alone / OPEN. As many trails as possible need to be linked to the Arapeen Trail System to encourage destination recreation having less adverse impact on our environment.	Please see general comment responses #20, #31 and #37
Craig	Wiley	Recreation	My intent is to protect the benefits we enjoy in accessing OUR public lands. I want to influence regulations to be more rationale and accommodating to the publics' need and at the same time preserve the environment and safety of all concerned. I want to help make sure the rules are logical, rationale and fair for all. I'm concerned about the new proposed restrictions regarding the area surrounding the San Rafael Swell. The proposed group size restrictions, I believe to be unrealistic. There is no justification for the proposal and it appears to be extremely arbitrary.	Please see general comment response #81
Richard	Wiley	OHV Route Identification	I'm concerned about the new proposed restrictions regarding the area surrounding the San Rafael Swell. The proposed group size restrictions, I believe to be unrealistic. In addition there appears to be very poor and less than accurate mapping of designated open trails such as the Chimney Rock - Summerville Trail System. I'm also questioning your rationale thinking regarding licensed and unlicensed OHV vehicles and the restrictions you have proposed and have placed on many trails.	Please see general comment responses #19, #31,#78 and #81

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John	Will	Minerals and Energy Resources	Protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles...With respect to oil and gas development, I urge you to protect all areas within America's Redrock Wilderness Act from oil and gas leasing and drilling.	Please see general comment responses #12, #36 and #101
John	Will	OHV Route Identification	1.That the Bureau of Land Management officially designate specific trails within the RMP, 2. That environmental impact regarding use of such trails be fully analyzed, this placed in writing in environmental impact statements. 3. That the RMP not designate any 'open areas' where ORVs would be allowed without restriction.	Please see general comment response #19
Mark and Terry	Williams	OHV Route Identification	I am curious to know what BLM plans to do with the Chimney Rock/Summerville Trail System and the proposed Arapeen Trail System. I know that I and the local OHV community submitted detailed route information regarding these trail systems very early in the process. Also, I did not see the proposed Cedar Mtn Jump Trail that was submitted before the process started and then again after it began. I am quite upset to learn that these trails aren't on any of the Maps in the Appendix. Public input is a critical component to the BLM's planning process. I am offended by the manner in which my and the OHV community's input is continuously ignored... my desire to keep all OHV routes open... The BLM in Utah has instructions to designate routes open to OHV use when revising Resource Management Plans. After reading the DRMP it is impossible to tell which roads and trails are to be left open to OHV use. The BLM needs to correct this problem and accurately disclose which roads and trials will be available for OHV use in each alternative in a manner that is easy to understand.	See general comment responses#19, # 20 and #31
Mark and Terry	Williams	OHV Route Identification	BLM's group size limits in all of the alternatives unnecessarily and unfairly submits small to mid-sized non-profit recreational activities to the same Special Recreation Permit process required for true for-profit commercial enterprises. Please reconsider the group size limits. I recommend BLM stay with proven 50 vehicle group size limit.	Please see general comment response #81
Mark and Terry	Williams	Recreation	Dispersed camping is also very important to us and our families. It is impossible to tell how many dispersed campsites each alternative will leave open. This needs to be corrected.	Please see general comment response #81
Steve	Williams	Wildlife and Fish	Wildlife seasonal restrictions need to be updated with valid scientific analysis - in many instances both recreational and oil and gas development managed with best practices can likely coexist with wildlife over a broader portion of the year.	Please see general comment response #42
Sara	Willis	Minerals and Energy Resources	Protect all wilderness quality lands by proposing alternate areas that would be acceptable for oil and gas exploration and drilling.	Please see general comment response #101
Sara	Willis	Recreation	I am especially interested in having separate areas/trails designated for motorized and non-motorized pursuits so that I can enjoy my outdoor experiences	Please see general comment responses #15 and #79
Howard	Wilshire	Minerals and Energy Resources	The BLM (Appendix 23) set out four "Integration Principles" for implementing the Energy Policy and Conservation Act, calling for both environmental protection and energy production, and ensuring an "..appropriate amount of accessibility to energy resource necessary for the nation's security.." None of the Alternatives fulfills these principles. Excessive access is given for oil and gas exploration at the expense of maintaining environmental quality in a region that demonstrably lacks an oil/gas endowment of any relevance to the nation's security. The areas mapped out for access are based on "occurrence potential" for conventional oil and gas (Map 3-21) and coal bed methane (Map 3-20), which are nearly completely irrelevant as is evident from comparison with the exploration and production histories of the lands under the Price Field Office jurisdiction. What is relevant is the potential amounts of hydrocarbons present and accessible for economic exploitation. The record clearly shows a potential for exploitation that is much circumscribed compared to the 'occurrence potential.' The record further shows that the production history and the likely future production are at levels of no national importance. A proper consideration of the record should result in management that greatly reduces the area to remain open for oil and	Please see general comment responses #18, #49 and #52

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			gas leasing (63% under the Preferred Alternative and 55% under the most protective Alternative C). The oil/gas exploration history of lands in the Price Field Office district from 1915 to 1993 (Ref 1) show scattered small areas of production that slowly filled in and extended along fairly well-defined trends in the 78 years of records. All of the producing areas, however, encompass numerous dry holes, and the largest part of the district is identified with hundreds of dry holes. For example, the eastern 3/4 of Emery County has practically no production in the 78 year period, but a great many dry holes. Yet, except for a doughnut of closed lands in the San Rafael Swell, it is mostly open for fluid mineral leasing under Alternative D, and large parts remain open for leasing under Alternative C. A short northerly trending line of oil and gas producers, surrounded by dry holes, is found in the NE corner or Emery Co, and two northwesterly trending lines in the SW and NE corners of Carbon Co. The first two-mentioned trends are mostly in lands not under the BLM's jurisdiction, the third has little protection from invasive exploration under Alternative D. Production records for conventional oil and gas fields in the Price Office area show that these small fields are of no national significance. Total oil production in 2000 from 19 fields is 3,490 barrels, dominantly from 10 wells in one field. this one year's production represents less than 2 ten-thousandths of one day's US current consumption (20 million barrels). In the same year, the 19 fields produced 873 million cubic feet of gas, about 15 thousandths of one day's US consumption. Cumulative production of the 19 fields amounted to 760 thousand barrels of oil, less than 4 hundredths of one day's US consumption, and 148 billion cubic feet of gas, less than 2.5 days of US consumption, and that figure includes more than 2 billion cubic feet of carbon dioxide, not methane from the Farnham Dome. Production records for coalbed methane in the Price Office area for 14 years amounts to 218 billion cubic feet of gas, about 3.6 day's US consumption, or 0.26 days US consumption per year. Reducing the production years to 6 when both counties in the Price Office district were producing total production mounted to 212 billion cubic feet, about 3.5 days US consumption, or .6 days US consumption per year. Taking only the last year, with the largest annual production in both counties, production amounted to about 76 billion cubic feet, or 1.25 days of US consumption. Although production of both oil and gas in the Price Office district is likely to increase in the future, US Geological Survey estimates of undiscovered resources indicate that this area is not nationally significant. Total petroleum systems assessments for the Uinta-Piceance Province relevant to the Price Office show mean estimates of 20.39 million barrels of technically recoverable oil, 1.02 day's current US consumption, and 13.1 trillion cubic feet of gas, 215 days of current US consumption. These are almost certainly overly optimistic estimates, which are little more than guesses, with a mean value calculated using the largest guess at a 1 in 20 chance of finding. The 29 in 20 chance of finding, also guesses, for oil and gas are good for .36 and 117 day's US consumption, respectively. Considering the number of years over which these minuscule resources may actually be produced, oil and gas in the Price Office district is irrelevant to the nation's energy security. On the other hand, the search for the tiny amounts likely to be found will damage huge amounts of land the management alternative set forth does not, therefore, show any semblance of balance for the resources present.	
Howard	Wilshire	OHV Route Identification	The DRMP/EIS also treats consumptive recreational activities with the same generous land allocation as oil and gas. Both the Preferred Alternative and Alternative C allocate a disproportionate amount of land to OHV uses. I have examined many of the OHV trails and areas of use in the Price Office area, and find that the use is impairing Wilderness Study Areas, and many other lands of wilderness quality not designated as WSAs. This recreational activity will leave long-lasting scars on a land whose scenic qualities are not surpassed anywhere in the world. I therefore urge you to take cognizance of the real land values in the Price Office district, and do major cuts in access for oil and gas exploration and for OHV recreation. In particular, I urge that you not allow oil and gas exploration and OHV routes in any citizen-proposed wilderness lands, and to designate lands having significant cultural, geologic, scenic, passive recreational, and plant and wildlife habitat as ACECs.	Please see general comment responses #12, #36 and #101

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Carla	Wilson	Minerals and Energy Resources	Many surface resources are very valuable and worth protecting. However, BLM must also acknowledge that our industry has demonstrated time and again its ability to produce much-needed energy resources without harming surface resources, including most animal species. Our technologies enable us to employ a number of different techniques to reduce or avoid impacts to surface resources. Our industry seeks solutions on a daily basis to mitigate the short-term impacts of exploration and production, and should be acknowledged by BLM and rewarded for doing so. Imposing arbitrary, excessive and unnecessary restrictions on exploration and production activity serves only to impede the delivery of energy resources and increase costs to consumers. It is incumbent upon the BLM to adequately analyze and disclose the socio-economic impacts of its decisions, as well as the impacts of those decisions on domestic energy supply. BLM should be highlighting measures that have been taken by industry and government working together to reduce impacts to surface resources, rather than imposing ever-more-restrictive stipulations to satisfy the desires of certain special interest groups. Moreover, it is incumbent upon the BLM to inform the public of the consequences of its decisions, so that the public can understand, adequately comment on and make recommendations concerning those decisions. Finally, BLM must use the best available science when determining how and when to impose restrictions on oil and gas activity. That should result in better decisionmaking and, quite honestly, in decisions that recognize the ability of the industry and allow further exploration and production activity on government lands.	Please see general comment response #18
Heggie	Wilson	Minerals and Energy Resources	The BLM should reconsider and revise the Preferred Alternative to eliminate the Nine Mile Canyon and Range Creek ACECs. There currently are numerous Federal, State and Fee leases along with producing wells with the proposed 3 mile restriction area in Nine Mile Canyon. These areas hold tremendous proven natural gas reserves and such a restriction would make development technologically impossible... The BLM needs to fully analyze the socioeconomic impact placed on oil and gas development within the planning area and account for the contribution these resources on public lands make to our society. I support the continued development of oil and gas as addressed in the Draft RMP/EIS, however, I find the Preferred Alternative will place additional restrictions on the oil and gas industry and limit our ability to access lands for environmentally responsible oil and gas leasing, exploration, and development	Please see general comment response #52, #128 and #132
Heggie	Wilson	Visual Resources	Likewise, the BLM should limit its application of Visual Resource Management Class II to those areas where there are no existing or planned resources development and not in areas where existing energy resources are known.	Please see general comment response #135
Kent	Wilson	Socioeconomics	As a business owner in Eastern Utah I would like to reiterate the importance of the extractive industry to our regional economy... There is nothing specific in the current RMP that demonstrates what we as a region stand to loose or gain due to additional regulations on natural gas, coal, and off-road interests. I ask that the BLM conduct a study that demonstrates just how your restrictions on natural gas, coal, and OHV use will affect our economy.	See general comment responses #2 and #132
Scott	Wilson	OHV Route Identification	My concern is that the area is closed up more than it already is. I have ridden horses and ATV's through the area for years. Please keep it all it perspective. Yes, there are roads and trails throughout the San Rafael Swell. Many of those roads/railroads have been there for many, many years. Many of them have been reclaimed by nature. Many more will be reclaimed by nature in the future. In comparison to the thousands of acres that are inaccessible by road, there is actually a small fraction of the area that is vehicle accessible. Being a responsible ATV rider, I have the same concern that I'm sure you have. Some people (usually younger riders/drivers), like to get off the trails. Please create a harsher punishment by fining them more $$$. I question how fair it is to make everyone pay for the actions of a few.	Please see general comment responses #10 and #19

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			I also think that if everyone looks at the big picture, they will realize that cattle have caused as much damage as motorized vehicles or horses. I've been to many places where water holes are damaged, trails are created, and the smell of cow dung permeates the air. I guess the difference is that cattle/horses have been around a lot longer, so their presence is now tolerated and perceived as natural. I know you realize that a cattle trail or ranching cabin is no more natural than an ATV track or road. Is it fair that cattle can roam wherever they want? Is it right that ranchers erect corrals, sheds, and lean-to's on the land? Well, I don't mean to ramble on and on. Please be fair. Access to all. Rules for all. I really believe that I have as much right to be there as a hiker (which I do a lot), a rancher, or an ATVer.	
Jeff	Winegar	Recreation	For the public record, I would like to express my opposition to alternative "D" in the above referenced plan, with respect to motorized travel on the Green River in Desolation and Gray Canyons. It is my understanding that this alternative, if implemented, would: 1.ban the use of all motors whenever river flow exceeds 5000cfs, 2.require 4-cycle motors to be used whenever motors are permitted, 3.limit the total number of motorized trips to 90 launches per year... Below, I have identified specific topics of concern, from a guide's perspective, which I hope will be considered in the formulation of any new policy regarding motorized river travel. Safety - This river section is notorious for it's adverse winds and extensive stretches of flat water. It is also known to be one of the most remote and inaccessible areas in the country. It's these factors that shadow our best efforts to ensure guest safety. Should injury or ill-health occur, the ability to get downstream quickly (upwards of 60 miles) under any circumstances is essential, and in most cases could only be accomplished by motoring. Thus, a motor might mean the difference between life, death or permanent disability at any flow. This would not only apply to a motorized group, but to any group that might be aided by such... Congestion If all groups were un-motorized, the best (or only) camps would be taken by those willing to leave the earliest, row the hardest, or hit camp the latest. This effect would be compounded by higher flows, in that fewer camps exist on the river bank, or in the form of sand bars... Enforcement and Planning for 5000cfs, and Who Gets the 90 Launches? Given that: -flows can change dramatically -groups usually arrive at the launch site after a full day of travel -in the case of many outfitters, a given trip is often packed 2-3 days prior to a launch How can anyone be expected to prepare for whether or not the flow will be above or below 5000cfs at certain times of the year? For example, in 2002, the first day that flow exceeded 5000cfs (5820), the preceding 15 days showed flows ranging randomly from 2960 to 4360. Two days prior, the flow was 3510. It is no easy task to second guess the runoff, and it's even harder to predict the annual release at Flaming Gorge!... And what happens if a group launches legally with a motor, and within a day or two, the level jumps to 6000cfs? Lastly, would this rule apply to those who now depend on motors to power research and enforcement craft? I believe if the proposed rule is good for one, it should be good for all. Lastly, what would be the criteria or selection process for the 90 motorized trips that would be allowed at levels below 5000cfs? Over the last ten years, flows have exceeded 5000cfs for hundreds of consecutive days during the summer season. How is one expected to apply for, and be granted a permit well in advance, without knowing if they will be allowed motor usage?... Pollution and Aesthetics There is obviously some increased concern for the local river environment, give the un-phased call for 4-cycle motors, combined with a ban on all motors above a certain flow level. This strikes me as ironic in two ways. First, why would the use of any gasoline motor be considered more environmentally friendly in lower flows? It stands to reason that there would be three times less dilution effect at 5000cfs than at 15000cfs. If you have a poorly maintained, un-tuned, smoking motor (2- or 4-cycle), would it not be better to run it in 100,000cfs of water? Second, the impact of small outboards used at aerated flows of even 1000cfs should be considered benign. Assuming: -the typical motorized group would usually use one, or at the most, two 8hp 2-cycle outboards -a typical full first-day of motoring uses about 3 gallons	Please see general comment response #34

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			of fuel-mix per motor (motor usage on subsequent days might be limited, or avoided altogether) -the fuel: oil ration can be as low as 100:1 Therefore, the entire unburned fuel-mix needed for two motors for one full day represents a possible maximum pollutant contribution of only 1 part in 604,800,000 per 24 hour period. And that's as raw, unburned fuel. (As if it were dumped straight into the river!) It follows then, that the concentration of actual combustion exhaust residue from this quantity of fuel-mix would be nothing by comparison. Accordingly, at 10,000cfs, the maximum unburned fuel contribution would be 1 in 6 billion/24hrs. Furthermore, if motors are to be restricted for aesthetic reasons - so as to do away with the associated noise and to perhaps adopt a more 'natural' approach to enjoying this section - I would suggest that ALL use of motors be restricted around and within the canyon corridor. this would include commercial and charter aircraft over-flights, and the uncontrolled intrusion of 4-wheelers, dirt bikes and 4-wheel drive vehicles on the primitive road(s) upstream from the Swasey's boat ramp. Interpretation and Enjoyment Lastly, I would like to draw your attention to the one very important fact. If I, as a guide, am spending my entire day rowing against the wind to make 23 miles before dark, I am not going to have time to show my guests - your visitors - the true wealth of Desolation and Gray Canyons. There will not be time to explore, hike, see and describe the natural history, geology, flora and fauna, and other intriguing aspects of the area. Furthermore, in the absence of being able to motor through long stretches of flat, slow, and uninspiring water, I will not be inclined to ask my guests to paddle their inflatable kayaks - a key feature in our operation - for up to 8 hours per day so as to keep up with me in my boat. A move away from existing motor use will serve to curtail the enjoyment of these guests, as well as our business base in this region. And if we don't bring the people, you don't collect the user fees.	
Jeff	Winegar	Recreation	I support the "no action" alternative regarding motor use in Desolation and Gray Canyons.	Please see general comment response #34
Amy	Winter	Minerals and Energy Resources	The Draft Plan designates oil and gas leasing as the dominant use of our public lands. Under the Plan, oil and gas development would be allowed in areas of little potential and low productivity. This is unacceptable treatment of our public lands. The BLM should designate all proposed wilderness areas off-limits to oil and gas drilling.	Please see general comment response #18, #36 and #101
Amy	Winter	OHV Route Identification	The BLM has a multiple-use mandate. Outdoor recreation is increasing on public lands in Utah. ORV use has increased by 900% in the past 20 years. It is becoming increasingly difficult to find unaffected areas. The Draft Plan fails to consider the growing damage to our lands caused by irresponsible ORV abuse. The Draft Plan designates all “existing” routes as open to motorized travel without assessing impacts to non-motorized users and wildlife. The Draft Plan fails to address conflicts between motorized and non-motorized users. ORV's need to be restricted. The Price RMP needs to regulate ORV use. Our public lands are being damaged beyond repair. The BLM should designate all proposed wilderness areas as off-limits to motorized recreation.	Please see general comment responses #12, #19, and #36
Amy	Winter	Wilderness	I am very concerned about wilderness and natural resources. The Draft Price RMP fails to adequately protect wilderness, wildlife habitat, water, and scenery from oil and gas drilling and ORV damage.	Please see general comment response #36
Amy	Winter	Wilderness	The Draft Plan fails to protect roadless areas. Allowing motorized routes within Wilderness Study Areas is UNACCEPTABLE. The BLM is supposed to PROTECT WSA's! The Draft Plan fails to provide protection for lands outside of existing WSA boundaries. The Draft Plan leaves approximately 98% of the remaining 1 million acres of wilderness quality lands unprotected. This is excessive and unbalanced!	Please see general comment response #36
Amy	Winter	Wilderness	I frequently travel to Utah to experience non-motorized, primitive recreation. The Draft RMP fails to provide protection for the wilderness-quality lands that I travel so far to visit. The Price Draft RMP appears to manage for today's political climate. I urge the BLM to consider our future. Balance energy development and off-road vehicle use with wilderness protection. Wilderness depends on the	Please see general comment response #36

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			BLM's decision. PLEASE PROTECT WILDERNESS.	
John	Wise	Minerals and Energy Resources	I urge the BLM to protect all areas within America's Redrock Wilderness Act from oil and gas leasing, drilling, and industrialized developments; particularly while the Act remains before Congress for its consideration. The oil and gas supply which may be gained from these activities is certainly limited; and does not compare with the irreplaceable wilderness lands and the crucial habitat they offer for deer, elk, bear cougar and other wildlife.	Please see general comment responses #12, #36 and #101
John	Wise	Process and Procedures	I have read the Castle County Heritage Plan and recommend that you give full consideration to it as it offers a solid balance between natural preservation and continued development and motorized recreation.	Please see general comment response #35
Larry	Witt	Wilderness	I am an ORV owner and southern Utah resident who OPPOSES the Price BLM proposals in their RMP to make Wilderness Study Areas accessible to motorized travel, and in general, disregard broader public interests.	Please see general comment responses #36 and #144
John	Witte	Wilderness	Your draft fails to strike a balance between preservation, recreation, and energy development. Instead, it favors a few special interests at the expense of the American public. It leaves 98 percent of wilderness-quality lands open to drilling and actually increases by nearly 20 percent the amount of land open to leasing without restrictions. HOW could you the stewards propose such a travesty?	Please see general comment responses #36 and #101. BLM would not lease without restrictions under any of the alternatives considered. At a minimum, all oil and gas leases are subject to the standard lease terms and all oil and gas activities are subject to the requirements of the Clean Air Act, Clean Water Act, Endangered Species Act, FLPMA and other Federal laws for protection of the environment. Applications for Permit to Drill (APDs) and Field Developments are subject to review under NEPA and site-specific mitigation is applied to approvals based on site-specific analysis.
Eleanor	Wolf	Minerals and Energy Resources	This draft land use plan does not provide enough protection outside of existing wilderness study areas. Instead, it opens up the magnificent landscapes and archeological sites in the San Rafael Swell, the Book Cliffs, Nine Mile Canyon, Desolation, Gray and Labyrinth Canyons to oil and gas leasing, drilling and development.	Please see general comment responses #18, #36 and #101
Eleanor	Wolf	OHV Route Identification	ORV trails should be limited to preserve public lands from noise, soil erosion and permanent damage to a fragile desert ecosystem. Restrict the ORVs to mapped and signed trails, with adequate enforcement.	Please see general comment responses #15 and #19
Michael	Wolfe	Cultural Resources	In the case of Nine Mile Canyon where valuable archaeological resources are located development should be sharply controlled.	Please see general comment response #9
Michael	Wolfe	Minerals and Energy Resources	My other concern is related to the oil and gas development. There is no reason why some parts of BLM land should not be closed to oil leasing and development. I am an archaeologist and have worked in the industry performing cultural resource inventories for the gas and oil companies. The recent rampant development of gas well in the vicinity of Price is an example of what happens to the landscape when oil development is allowed to proceed unchecked. Four wells per section with accompanying access roads and pipelines has a tremendous impact on the land. Before these big projects are allowed to proceed full EIS must be prepared to assess the total impacts. Mitigation projects should be developed to compensate for the detrimental affects of intensive development.	See general comment responses #18, #36 and #101. The EIS evaluates several alternatives in detail to assure that a balanced approach that will ensure protection of resource values while allowing opportunities for mineral exploration and production is considered. The management actions in the Proposed RMP are designed to offer management flexibility to protect resource values and uses while allowing for acceptable levels of mineral development. Any future proposed oil and gas activities would require additional NEPA analysis and application of mitigation measures to protect

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				the environment.
Michael	Wolfe	Minerals and Energy Resources	There are so many areas open to oil and gas development that there is no reason why areas within America's Redrock Wilderness Act can not be closed to oil and gas development. When on-site assessments are made by land managers for proposed well locations there should be some locations that are not approved, if there are good reasons to protect cultural or other resources; instead of the process now where oil companies have there way on every single well location. This land belongs to everyone. Decisions made by land managers in the BLM should not be overridden by higher up politicians as has happened in the Price district.	Please see general comment responses #36 and #101
Michael	Wolfe	OHV Route Identification	I am writing regarding the Draft Price resource Management Plan. My concerns are primarily related to too much ORV and ATV usage allowed. The rampant increase in usage of these vehicles is detrimentally affecting the landscape and also impacting the experience of other land users. These vehicles should not be allowed to go everywhere. The current proposed RMP allows too much land open to these vehicles. No areas should be open to uncontrolled use. No ORV trails should be allowed close to any existing wilderness study areas.	See general comment responses #12, #15 and #19.
James	Wood	Minerals and Energy Resources	Although the BLM has confirmed that more than a million acres of lands in this area qualify for federal wilderness protection and 1.5 million acres are included in America's Redrock Wilderness Act, the draft plan would open virtually all of these wildlands to oil and gas development, threatening such renowned treasures as the remote and wildlife-rich Book Cliffs as well as Desolation and Labyrinth canyons. In all, the plan would open some 98 percent of lands that should be preserved as wilderness (but have not yet been protected by Congress) to drill pads, roads, waste pits and more. Rather than sacrificing these spectacular places to the energy industry, the BLM should protect these special places from energy development.	Please see general comment responses #18 and #101
James	Wood	OHV Route Identification	The BLM should also move promptly to protect the areas where ORV damage is too great, including areas proposed for wilderness designation under the legislation now pending in Congress. I support the BLM's proposals to prohibit cross-country ORV use outright and to designate specific ORV trails, provided thorough environmental studies show that ORV use is appropriate. But all other areas should be preserved from the scarring and other harm caused by ORVs. Opening new areas like the trail to the top of the Book Cliffs, which your plan proposes, should be rejected. Realistic and effective plans for enforcing these protections must also be developed.	Please see general comment responses #12, #15, #19 and #36
James	Wood	Wilderness	The Bush administration has promised to protect wilderness characteristics of public lands. Few public lands are more deserving of such protection than the wilderness-quality lands within the Price area. Your proposed plan is totally unbalanced in refusing to provide any meaningful protection for these magnificent and irreplaceable wildlands. On behalf of future generations, I ask that you replace your draft plan with a balanced plan that provides for a full range of values and uses, including wilderness.	Please see general comment response #36
Jason	Wooden	OHV Route Identification	I've seen more options for off-road use in national parks (e.g., Canyonlands) than what is being proposed for the "Swell". Please loosen up the proposed ORV regulations. Although a treasure, the "Swell" is NOT a national park and shouldn't be managed like one. If issues exist with ORV abuse (of which I have not personally witnessed in the area) please take an educational/enforcement position rather than one of closing trails for ORV use. Working with organizations like the Blue Ribbon Coalition and Utah Trail Machines Association for peer enforcement also has proven effective in other parts of the state.	Please see general comment responses #10 and #19
Pattie	Woods	OHV Route Identification	I am writing this letter in a state of confusion about the lack of careful and thoughtful planning in preserving the wilderness areas not only in Utah, but in every state. I strongly protest the encroachment of off-road vehicles in areas meant to be wild. Nothing detracts more from the enjoyment than to have a group of ORV riders tearing up hillsides just to see if they can make it to the top. These two groups of people should not have to be in conflict.	Please see general comment responses #12, #19 and #36

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Sarah	Woolsey	Minerals and Energy Resources	Unlike Zion, it is at risk for development by oil developers. Despite the projections that the amounts of fossil fuels under these “rocks” will be miniscule, the BLM Draft opens up far too much of this beautiful land to destruction by exploration. Protect this place-you can never repair the damage of exploration, let alone drilling. These streams and Cottonwood banks are vital desert habitats	Please see general comment responses #18 , #36 and #101
Sarah	Woolsey	OHV Route Identification	I was lucky it wasn’t a popular ATV site that day….or it might not have been so quiet. I also support restrictions on ORV use in these areas. Do not allow area of unrestricted ORV use, we all need to share these treasures. Make sure all routes are studied for impact. Please do not open ORVs to already protected wilderness study areas.	Please see general comment responses #12, #19, and #36
Crista	Worthy	Cultural Resources	This will protect some of the most important places in Utah: places such as Nine Mile Canyon. Those are some of the most beautiful petroglyphs I have ever seen. The owl is unlike any I have seen before. This plan represents the best balance between use and protection.	Please see general comment response #9
Crista	Worthy	Minerals and Energy Resources	THE BLM IS GIVING AWAY LAND THAT BELONGS TO ME AS A US CITIZEN AND TAXPAYER, AND TO ALL OTHER CITIZENS, TO A FEW GREEDY ENERGY COMPANIES, SO THEY CAN RUIN IT. Please find a way to postpone this	Please see general comment response #18
Crista	Worthy	Minerals and Energy Resources	Oil and gas development is getting out of hand. For instance, a few months ago I visited Deadhorse State Park, and new oil rigs were being put up right next to the park. Some of them were so tall that they obstructed the view down east into the valley. What a shame. Please protect the Price River Wilderness Unit, the Big Horn Benches and Rabbit Valley, Christmas Canyon, Franks Canyon, Maverick Canyon, Upper Rock House Canyon, Horse Bench, and especially Nine Mile Canyon. There's hardly any oil here anyway, and if we really need it, we can drill later, but we are a long way from that now.	Please see general comment responses #36 and #101
Crista	Worthy	OHV Route Identification	PLEASE design and publish a MAP showing where ORV use is allowed and where it is not, and then ENFORCE it!!	Please see general comment responses #15, #19 and #31
Crista	Worthy	OHV Route Identification	I especially urge the BLM to protect Utah from abuse by off-road vehicles. I have personally spoken to a number of these people. Most of them are law-abiding. Some, however, are not. They want to drive their Jeeps over every inch of land. They are like gun-owners who insist on buying assault weapons. I have been screamed at and threatened by Jeepers when I simply asked them to obey the law and stay on designated and legal trails. This tells me that you need strong enforcement, because these people don't care if they tear up the desert.	Please see general comment responses #15 and #19
Crista	Worthy	Process and Procedures	I want you to know that I support the Castle County Heritage Plan.	Please see general comment response #35
Crista	Worthy	Transportation and Access	I am a pilot. I am also a wilderness activist. I hope that oil and gas drilling will be minimized in the new RMP. I also hope that ORV trails will be mapped, designated, and a real plan will be devised to prevent ORVs from illegally creating new trails and further tearing up the desert. I hope that you will allow continued use of the airstrips within the Price RMP. Remember, the average backcountry airstrip is less than half of one mile long. It doesn't grow. Airplanes don't normally go off the runway and start driving all over the desert. Pilots arrive without a car, usually they just camp near their plane, or go for a hike in the area. All backcountry pilots who are members of flying organizations have been educated as to the importance of flying safely, courteously, obeying all rules while camping or hiking, packing out trash, etc. There is little damage they can do with their feet, certainly compared to ORVs.	Please see general comment response #21

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			Pilots must be responsible; their lives depend on it. Alcohol and flying do not mix. Most pilots are fairly well educated; it's not easy to earn and keep a pilot's license, and I believe that pilots are generally a trustworthy bunch of folks. We would deplore vandalism of archeological sites. Mexican Mountain and Hidden Splendor are particular favorites of mine. I appreciate the fact that the BLM has allowed continued use of these strips. We really enjoy the quiet of hikes in the area. The airstrips, all of them, are also important in case of need for an emergency landing.	
Clay	Wright	Process and Procedures	Was not the BLM created and designed to regulate and take care of the public lands as deemed best by the public, for the public and not to be controlled by high ranking officials within this department and special interest groups. By doing sneaky underhanded things such as trying to put something like this plan into affect without properly notifying and then being directed by the majority of public opinion (especially local public opinion) seems to me to be overstepping their authority. It appears they are trying to put this plan into affect as quietly as possible in order not to let the public know what they are doing because they sense that the public would not approve. Although I realize that they have probably followed the laws which they must for public notification, comment, and etc. I feel they could have and morally should have advertised the meetings and their intentions with this plan in a fashion that would let the general public who are supposed to be in control of, and who use these public lands much more effectively... I feel that the type of control this plan intends to apply does not only infringe upon the rights of the people that make up the public, it will also bring us closer to destroying a way of life.	Please see general comment responses #142 and #145
Jaki	Wright	Process and Procedures	I am writing to protest the Price Resource Management Plan draft alternatives. Please protect America's Redrock Wilderness! This beautiful landscape is a treasure that belongs to all American people, and it would be a tragedy if it were destroyed.	Please see general comment response #36
Karen	Wright	Cultural Resources	I have heard about attempts to ruin this sacred and beautiful canyon and ask that you ensure the canyon walls and floor are protected, and stop any and all industrialization of the canyon. America needs to stop wiping out our national heritages including our sacred sites of American Indians.	Please see general comment response #9
Marilynn	Wright	Minerals and Energy Resources	Protect our pristine areas from oil and mineral companies.	Please see general comment responses #18, #36 and #101
Marilynn	Wright	OHV Route Identification	Restrict ORV's to trails and areas that will ensure protection of our pristine areas. (maps, signs, and enforcement).	Please see general comment responses #12, #15 and #19
Sarah	Wright	Wilderness	There are too many natural wonders that are now becoming unprotected wilderness areas. I would hate to see Utah's wilderness fall into the same category. Please let these lands stay preserved and untouched by commercial and industrial purposes.	Please see general comment response #36
Gary	Wulfenstein	OHV Route Identification	So closing roads not only limits off road vehicle use in those areas but prevents families from conducting wholesome activities. I was dismayed this last year as many routes were closed to four wheelers (the only way I can travel any distance). So now I can see even less of my beloved "Swell". It didn't stop there. Now you are planning to close even more roads and trails.	Please see general comment responses #19 and #80
Gary	Wulfenstein	Transportation and Access	I am passionate about the San Rafael Swell area. I believe that this is the most beautiful place on earth. Whenever possible I go and enjoy the wonderful scenery. I and my family have been frequenting the area for many years and we intend to continue enjoying this great place for years to come. One of our favorite places is up Saddle Horse Canyon, sadly we are not welcome there any more. I have a bad	Please see general comment responses #10 and #80

First Name	Last Name	Category	Comment	Response
			knee and can't carry all of the items needed, for that long of a distance. I have done a lot of hiking in the past and even have found unique features that had previously been unknown. Now I can hike but just not that far. I also have too children who could not make a walk of that distance.	
Bryan	Wyberg	Minerals and Energy Resources	Legal Requirements for Multiple Use Management: It is clear that politically motivated pandering to special (energy industry) interests has trumped sound public policy decisions regarding energy development on our public lands. The BLM has been instructed to operate contrary to the legal requirements governing management of our public lands. It has been widely published that the White House under this President has instructed the BLM to make energy development the Number One, top priority "Use" on all the lands it manages. But the Congress has legally required that our public lands be managed for MULTIPLE USES. All I want and ask is for this legal requirement to be administered in a fair, reasonable and BALANCED manner. I find the BLM to be in an ethically untenable position if this draft RMP is finalized in this current state. It is NOT a balanced policy to place energy development above ALL OTHER uses of nearly ALL (98 percent) of these lands. It is NOT an acceptable policy to open 98 percent of the most magnificent, most beautiful, most awe-inspiring of ALL our public wilderness lands to the despoiling effects of energy development! The BLM cannot reasonably claim to be respecting the "Wilderness Preservation Use" applicable to these qualified wilderness public lands when the ONLY areas left off-limits to energy development are those Wilderness Study Area acres where the BLM has no other choice [because of the need to uphold specific Congressional instruction.	See general comment responses #36 and #120. Multiple Use, as defined in FLPMA provides for managing the public lands and their various resources so that they are utilized in the best 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 Proposed RMP reflects 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 Preferred Alternative, including those that provide protection of sensitive resources.
Bryan	Wyberg	OHV Route Identification	I believe very strongly that the RMP should also act immediately to protect areas where ORV damage is occurring... I believe that the BLM is obligated to completely protect from ORV damage all lands included in the America's Redrock Wilderness Act for wilderness designation... I also urge the BLM to designate specific ORV trails, but only if a scientifically based environmental analysis determines that ORV use is appropriate and will not have damaging impacts to the natural resources (including suitability as wildlife habitat)... ORV use must only be allowed where there is no possibility of damaging either visible or buried cultural, archaeological, or paleontology resources... I do not believe there is justification for the opening of any new areas to ORV access. The lands are riddled with user-created illegal ORV paths. There are virtually no areas that are more than a mile or two miles from an ORV access routes. Please consider how far the excessive noise of ORV activity carries in these lands. There is almost no area that users in search of quiet recreation are free of the negative impact of ORV noise degrading their experience. Specifically, I feel that there is no support for the trail to the top of the Book Cliffs proposed in this draft RMP, thus it should be rejected. Finally, the RMP must include specific requirements for appropriate signage of authorized ORV routes and a "Closed if Not Signed As Open" policy. There must be adequate provisions for executing realistic and effective plans for enforcement of the authorized ORV routes and regulations. A specific, short timeline should be specified for the development and implementation of these plans and enforcement procedures. Strong disciplinary action should be included to make the breaking of these ORV rules painful enough to ensure compliance.	See general comment responses #12, #15, #19 #20 and #36.
Bryan	Wyberg	OHV Route Identification	Off-Road Vehicle (ORV) Issues: Up until now, my comments have concentrated on the land use decision-making of the BLM. But I also have significant concerns regarding the management of ORV users of these Price district lands. I believe very strongly that the RMP should also act immediately to protect areas where ORV damage is occurring. In addition, for many of the reasons covered above, I believe that the BLM is obligated to completely protect from ORV damage all lands included in the America's Redrock Wilderness Act for wilderness designation. I do strongly support the proposals that prohibit cross-country ORV use outright. I also urge the BLM to designate	See general comment responses#9, #12, #15 and #20.

First Name	Last Name	Category	Comment	Response
			specific ORV trails, but only if a scientifically based environmental analysis determines that ORV use is appropriate and will not have damaging impacts to the natural resources (including suitability as wildlife habitat). Archaeological and other resources should be considered. ORV use must only be allowed where there is no possibility of damaging either visible or buried cultural, archaeological, or paleontology resources. All other areas should be preserved from the scarring and other harm caused by ORV use. I do not believe there is justification for the opening of any new areas to ORV access. The lands are riddled with user-created illegal ORV paths. There are virtually no areas that are more than a mile or two miles from an ORV access route. Please consider how far the excessive noise of ORV activity carries in these lands. There is almost no area that users in search of quiet recreation are free of the negative impact of ORV noise degrading their experience. Specifically, I feel that there is no support for the trail to the top of the Book Cliffs proposed in this draft RMP, thus it should be rejected. Finally, the RMP must include specific requirements for appropriate signage of authorized ORV routes and a "Closed if Not Signed As Open" policy. There must be adequate provisions for executing realistic and effective plans for enforcement of the authorized ORV routes and regulations. A specific, short timeline should be specified for the development and implementation of these plans and enforcement procedures. Strong disciplinary action should be included to make the breaking of these ORV rules painful enough to ensure compliance.	
Bryan	Wyberg	Process and Procedures	I am urging the Bureau of Land Management (BLM) to discard the draft RMP under review. The BLM must develop a more balanced plan. There must be accommodation of more than just energy development uses of these public lands. I believe that honest, ethical management as the stewards of these lands for ALL Americans simply requires that the BLM reject its current draft RMP to develop instead an RMP that embraces the needs of all stakeholders of these lands... In this draft RMP, the BLM has unfairly and completely destroyed this possibility, replacing it with oil and gas development and the industrial infrastructure and detritus that accompany it... As a part owner of these magnificent public lands, I urge the BLM to abandon its UNBALANCED draft RMP. I hope the BLM to its required fair and balanced stewardship requirements for these priceless lands... I ask the BLM to reject this draft Plan. Please release a BALANCED plan that provides for a full range of values and uses. INCLUDING wilderness.	Please see general comment responses #1 and #36
Bryan	Wyberg	Process and Procedures	I would like the BLM to analyze whether it has been open to the opinions of stakeholders who advocate conservation of these lands. I did not see a single organization dedicated to conservation or environmental protection listed when I reviewed the public involvement documentation. There is a claim of "collaborative management policy" ... the "Four C's - Consultation, Cooperation, and Communication - all in the service of Conservation."	Please see general comment responses #142 and #145
Bryan	Wyberg	Process and Procedures	I would like the BLM to analyze whether it has been open to the opinions of stakeholders who advocate conservation of these lands. I did not see a single organization dedicated to conservation or environmental protection listed when I reviewed the public involvement documentation. There is a claim of "collaborative management policy"... the "Four C's - Consultation, Cooperation, and Communication - all in the service of Conservation." Unfortunately I do not feel, nor do I see ANY EVIDENCE, that my opinions or desires for wilderness protection ever received any tangible consideration at all. Please document specifically where I am wrong about this.	Please see general comment responses #142 and #145

First Name	Last Name	Category	Comment	Response
Bryan	Wyberg	Wilderness	I believe that it is unacceptable for the BLM to act as sole arbiter of these lands when their final use is under specific, active consideration by Congress and the public at large. It is inappropriate for the BLM to take concerted actions that could if any way effectively remove the decision on wilderness designation from the hands of Congress and the American people... The BLM must not change the protective management of lands specified within the America's Redrock Wilderness Act. I strongly believe that the BLM should protect these special places from energy extraction and all other potentially damaging uses - until Congress FORMALLY ACTS on either this specific bill, the America's Redrock Wilderness Act, or any substitute legislation that includes consideration of the Price Field Office jurisdiction lands. Only after Congress acts, including open debate and a vote - and regardless of the outcome of that debate and vote - only then should the BLM move to change its management policies to open the lands in question to uses that could impact their wilderness qualities... I find the BLM to be in an ethically untenable position if this draft RMP is finalized in this current state. It is NOT a balanced policy to place energy development above ALL OTHER uses of nearly ALL (98 percent) of these lands. It is NOT an acceptable policy to open 98 percent of the most magnificent, most beautiful, most awe-inspiring of ALL our public wilderness lands to the despoiling effects of energy development!	Please see general comment responses #18, #36 and #101
Bryan	Wyberg	Wilderness	In this draft RMP, the BLM has unfairly and completely destroyed this possibility, replacing it with oil and gas development and the industrial infrastructure and detritus that accompany it. An indefensible 98 percent of these lands are stripped of all protection from development. As a part owner of these magnificent public lands, I urge the BLM to abandon its UNBALANCED draft RMP. I urge you to protect all these wilderness quality lands from the irreversible harms that oil and gas drilling will surely inflict.	Please see general comment responses #18, #36 and #101
Bryan	Wyberg	Wilderness	Interference with Congressional Deliberations: Please consider the following. The BLM has itself previously confirmed that more than a million acres of our lands in this area qualify for federal wilderness protection. Regardless of recent machinations between Secretary Norton and the State of Utah, the fact remains that the BLM itself had found these lands to be wilderness quality, and as such had managed these lands specifically to protect these wilderness qualities. Furthermore, there is currently before Congress an Act that would specifically protect within the National Wilderness Preservation System 1.5 million acres of the lands to be managed under this draft RMP. These magnificent lands are included in America's Redrock Wilderness Act. Note that this Act is not some esoteric bill offered by a couple members of Congress and devoid of significance, seriousness, or support. Rather, this Act is CO-SPONSORED by 162 Representatives and at least nine Senators! As you know, co-sponsorship represents a Congressperson's most intimate advocacy of an issue, but support for the legislation extends far wider than this impressive co-sponsorship list alone. And this America's Redrock Wilderness Act is strongly supported by a majority of the American citizenry, who of course are in point of fact the true owners of these [and all of] our public lands. I believe that it is unacceptable for the BLM to act as sole arbiter of these lands when their final use is under specific, active consideration by Congress and the public at large. It is inappropriate for the BLM to take concerted actions that could in any way effectively remove the decision on wilderness designation from the hands of Congress and the American people. This draft RMP would open these lands to leasing and energy extraction activity that would certainly disqualify them from wilderness designation. he BLM has managed, and I believe, is still managing them until a new RMP is released, these lands as de facto wilderness by precluding destructive activities that would change their	Please see general comment response #36 and #120

First Name	Last Name	Category	Comment	Response
			wilderness character. The BLM must not change the protective management of any lands specified within the America's Redrock Wilderness Act.	
Bryan	Wyberg	Wilderness	I strongly believe that the BLM should protect these special places from energy extraction and all other potentially damaging uses - until Congress FORMALLY ACTS on either this specific bill, the America's Redrock Wilderness Act, or any substitute legislation that includes consideration of the Price Field Office jurisdiction lands. Only after Congress acts, including open debate and a vote - and regardless of the outcome of that debate and vote -only then should the BLM move to change its management policies to open the lands in question to uses that could impact their wilderness qualities. I would like the BLM to research this question of appropriate action. Should the BLM take actions that could abrogate the choices under active consideration by Congress within a specific bill enjoying wide co-sponsorship and public support? What precedents exist? Is there a legal obligation to AVOID taking the decision out of the hands of the Congress and the American people? Is it ethical of the BLM to do so?	Please see general comment response #36 and #120
Bryan	Wyberg	Wilderness	The Bush Administration has made promises to protect wilderness characteristics of our public lands. Few public lands are more deserving of such protection than the wilderness-quality lands within the Price Field Office jurisdiction area. Yet this draft RMP is totally unbalanced. It completely eliminates any meaningful protection for these magnificent and irreplaceable wilderness quality lands. I hold the BLM to its required fair and balanced stewardship requirements for these priceless lands. Please act to include my comments and concerns in the final Price Resource Management Plan. I write on behalf of my children and of future generations of Americans. Please do not destroy their opportunity to experience the magnificent wilderness under your management. I ask the BLM to reject this draft Plan. Please release a BALANCED plan that provides for a full range of values and uses, INCLUDING wilderness.	Please see general comment response #36 and #120
Bryan	Wyberg	Wilderness	I urge you to protect all these wilderness quality lands from the irreversible harms that oil and gas drilling will surely inflict... I would like the BLM to research this question of appropriate action. Should the BLM take actions that could abrogate the choices under active considerations by Congress within a specific bill enjoying wide co-sponsorship and public support? What precedents exist? Is there a legal obligation to AVOID taking the decision out of the hands of the congress and the American people? Is it ethical of the BLM to do so?...	Please see general comment response #36
Bryan	Wyberg	Wilderness	Unfortunately I do not feel, nor do I see ANY EVIDENCE, that my opinions or desires for wilderness protection ever received any tangible consideration at all. Please document specifically where I am wrong about this. Also, please document that the proponents of energy development were not given any different level of access or consideration of their views during the development of this draft RMP.	Please see general comment response #36
Carmel	Yaigur	ACEC	Please carefully consider decisions to change negatively impacted special areas such as Utah's San Rafael Swell, Desolation Canyon, Nine Mile Canyon and Muddy Creek. It is imperative that these areas be kept pristine to protect their geological uniqueness and impressive wildlife.	Please see general comment response #30
Carmel	Yaigur	Minerals and Energy Resources	Oil companies must utilize the lands they have already been given rather than decimating protected wilderness areas.	Please see general comment responses #18, #36 and #101
Carmel	Yaigur	OHV Route Identification	Finally, please create designated trails for ORV use. ORV users deserve trails for their usage but not at the expense of protected landscapes.	Please see general comment response #19
Lawrence	Young	Minerals and Energy	Finally, I would ask that the EIS include a detailed analysis of the known or reasonably expected coal, oil and gas reserves in the Swell and relate those numbers to how many days those reserves would heat America's homes	See general comment responses #71, and #77. The Mineral Potential Report gives the analysis of

First Name	Last Name	Category	Comment	Response
		Resources	(or some other easily understood comparison). With that sort of analysis the average citizen could intelligently comment and balance the wilderness, cultural, recreational and scenic characteristics of the Swell with the possible benefits to our future energy needs.	the known and reasonably expected coal, oil and gas potential areas in the Price Field Office area. It is unlikely that coal, oil, and gas development will occur in the San Rafael Swell. Areas acceptable for further consideration for coal leasing include the Book Cliffs, Wasatch Plateau, and Emery coal fields. As shown on Map 3-19 of the DEIS, there are no known coal recovery areas or potential coal reserves in the San Rafael Swell. Page 3-53 states it is unlikely that any areas with low oil and gas potential will be developed in the next 15 years. As shown on Map 3-20 and Map 3-21 the San Rafael Swell has no occurrence potential for coal bed natural gas and a low occurrence potential for conventional oil and gas.
Lawrence	Young	OHV Route Identification	Also, as I have hiked in the Sids Mountain Area and other wilderness study areas (WSA's), I have noticed significant Off Highway Vehicle (OHV) use. At a minimum, I exhort you not to designate trails for OHV's in existing WSA's. You know better than I how fragile the soils and vegetation are in the Swell, so please fully analyze in the EIS any OHV trails that are designated. Please include in the EIS an OHV trails map which would obviously prohibit off trail OHV usage.	See general comment responses #12, #19, #20 and #144
Lawrence	Young	Wild and Scenic Rivers	I was surprised by the fact that the Preferred Alternative does not include, as Wild, any of the 319 miles of rivers that are eligible Wild Rivers. I would ask that you reconsider that determination and include all of the river designations of Alternative C in the revised Preferred Alternative. It is inconceivable to me that the Preferred Alternative would only designate the stretch of the San Rafael River seen from the Wedge as merely recreational. That stretch certainly deserves Class I VRM protection and Wild designation.	See general comment responses #25 and #27
Don	Youngdahl	OHV Route Identification	I am very concerned to learn that the current Draft Resource Management Plan omits most or virtually all of the current OHV routes submitted by local OHV groups in the public input and planning process. This seems to me to be a draconian "closure" of vast amounts of beautiful country to responsible recreational groups whose environmental impact is minimal by any reasonable standard. Please re-consider these grievous omissions.	Please see general comment responses #19, #20 and #31
Lanie	Youngman	Minerals and Energy Resources	The Price Resource Management Plan draft is more discouraging news about our government's idea on how to continue our dependence on fossil fuels. Stop this way of thinking now Not only will we be a step ahead of the transportation game, but will protect what little natural spaces we have left.	Please see general comment response #18, #49 and #52
Tom and Ann	Yuill	OHV Route Identification	Public use of these lands is reasonable within certain limits, and can accommodate both vehicular and non-vehicular use. These limits can accommodate recreational use by vehicles on designated trails and roads. In order to prevent off-road use (with resulting ecological damage) and facilitate enforcement, areas should be posted as "closed until posted open".	Please see general comment responses #15 and #19
Philip	Zacharczyk	Transportation and Access	I Please do not sanction further unstructured desert driving by encouraging the almost limitless availability of off-road routes in these areas. Similarly, I do not support the use of this area for the furthering of an unwise energy policy as currently posited by the Bush administration.	Please see general comment responses #12, #19, #49 and #52

First Name	Last Name	Category	Comment	Response
Bradley	Zane	OHV Route Identification	The Preferred Alternative plan shows no trail systems. This glaring omission portends the loss many existing motorized routes in the rush to finalize the RMP/DEIS. I find this odd give the copious number of well documented trail systems and roads which have been mapped and submitted by the public. Until a clear inventory must be established.	Please see general comment responses #19, #20 and #31
Bradley	Zane	OHV Route Identification	The following routes which were affected by the San Rafael Route Designation Plan of February 2003 should be reopened, including, but not limited to; Copper Globe, Devil's Canyon, June's Bottom, Link Flat, Picture Flat to Miller's Canyon, Red Hole Draw, Seger's Hole, Short Canyon. Add to this list Mexican Mountain and Swasey's Leap, and the "Purple Trail".	The issues regarding the routes identified in the comment were resolved through the San Rafael Route Designation Plan of 2003. The San Rafael Route Designation Plan is carried forward as common to all alternatives. See general comment response #20.
Bradley	Zane	OHV Route Identification	Off road vehicle use continues to expand while sanctioned OHV areas shrink in size. This reality funnels users in ever-smaller areas, condensing impacts. Due to finite resources there is a need to make existing OHV recreational areas efficient and safe while mitigating the impacts and enhancing the experience of the users.	Please see general comment response #19
Bradley	Zane	OHV Route Identification	The Preferred Alternative plan shows no trail systems. This glaring omission portends the loss of many existing motorized routes in the rush to finalize the RMP/DEIS. I find this odd give the copious number of well documented trail systems and roads which have been mapped and submitted by the public. A clear inventory must be established.	Please see general comment responses #19, #20 and #31
Bradley	Zane	OHV Route Identification	4. Trail Development - Expand and Reestablish Looped trail Systems- Single Track Systems Creating looped trail systems along with "trail head to trail head" access for non-street licensed vehicles is one means of achieving an expanded reestablished loop trail system. Further, the shared access concept of combining ATV and Motorcycle trails is, in some instances, not consistent with good resource management. ATVs and motorcycles have entirely different trail design requirements and impacts. In many, if not most instances, the narrow mountain trails used by motorcycles are not suitable for ATV use. It is my experience that any trail that traverses sensitive areas should be limited to 2-wheel use, only. Often, motorcycle travel experiences are degraded by ATV trail impacts, such as rounded edges, wide trails with vegetation loss, large turn out areas, and rocks that have been churned up. The "Purple Trail" provides a connecting loop into the lower colored trail systems and thus should be reopened. In the Cannel Meadows Ranger District in California the benefits of looped systems can clearly be seen in the "Kennedy Meadows" riding area. There the looped system has provided safer trails and helped in managing an even distribution of wear and tear on the trail.	Please see general comment responses #19 and #79.
Bradley	Zane	OHV Route Identification	Off road vehicle use continues to expand while sanctioned OHV areas shrink in size. This reality funnels users in ever-smaller areas, condensing impacts. Due to finite resources there is a need to make existing OHV recreational areas efficient and safe while mitigating the impacts and enhancing the experience of the users.	Please see general comment responses #15 and #19
Bradley	Zane	OHV Route Identification	Currently I favor the "No Action Alternative" until such time as a full route inventory or a Route Designation Plan is devised that incorporates information and maps provided by the public at large. The Resource Management Plan is flawed and selecting any of the other alternatives has too much risk in the potential loss of hundreds of miles of motorized routes and trails. The loss of motorized routes all but insures an increased level of impact that may not be sustainable on	Please see general comment responses #15, #19 and #31

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			the remaining resources.	
Bradley	Zane	Recreation	I consider the "Dispersed Camping and Group Camping Permits" to be a thinly discussed and measure adapted to prevent families and members of organizations from visiting Public Lands as a group. Groups lacking funds and/or the flexibility to plan well in advance are being locked out of public lands. Worse, BLM lack of staff to properly manage and enforce this policy virtually insures uneven application of the law which may then be interpreted as discrimination in resulting litigation. For example, if large groups require permits and small groups do not, how will a situation where small group gathering and large group gathering coincide at the same location be legally resolved? In the case of vehicle count why would one operator with a truck carrying one OHV count as two vehicles when, in fact only one vehicle could be operated at any given time?	Please see general comment response #81
Bradley	Zane	Wild and Scenic Rivers	Where the DRMP talks about the "Coal Wash" area (North and South). Though water can be seen in the "Coal Wash" area (North and South) they are primarily dry. Please don't attempt to designate a dry wash as a river. If you do, it will undoubtedly create more issues than you are prepared to handle by unnecessary bringing instability to this "Conditional Use" area. Don't mess with one of your success stories.	Please see general comment response #88. Coal Wash would not be suitable under the Proposed RMP.
Bradley	Zane	Wild and Scenic Rivers	Please don't attempt to designate a dry wash as a Wild and Scenic river, this is particularly true in regards to the "Coal Wash" area (North and south).	Please see general comment response #88
Andrew	Zeiler	OHV Route Identification	The Castle Country Heritage Plan protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles and includes opportunities for these activities. The draft Price RMP does not offer any options which appropriately meet these objectives.	Please see general comment responses #12, #35 and #36
Robert	Zucchi	Minerals and Energy Resources	I urge you to abandon your unbalanced draft plan for the 2.5 million acres managed by the Bureau of Land Management's Price Field Office. Rather than sacrifice these magnificent wildlands to oil and gas development, I urge you to protect them from the irreversible harm that oil and gas drilling would inflict.	Please see general comment responses #18 and #101
E.B.	Zukoski	OHV Route Identification	Designating virtually every identified existing route and trail as a motorized route is not a prudent approach to dealing with motorized recreation. BLM has a duty under the Executive Orders governing ORV use to plan and manage such use to eliminate adverse effects to the environment. BLM must consider the impacts of such a decision in encouraging and rewarding such illegal actions in any subsequently prepared NEPA document. BLM needs to complete a comprehensive route designation plan that considers non-motorized users of public land, identifying and protecting sensitive areas that will be degraded by continued ORV use.	Please see general comment responses #15 and #19
E.B.	Zukoski	OHV Route Identification	ORVs are not appropriate in citizen-proposed wilderness areas or WSAs. For any motorized use in WSAs, BLM must identify whether the designation of routes could result in any new surface disturbance in violation of the IMP by encouraging an increase in damaging use. Given that there are over 2,500 miles of motorized trails for ORV riders on lands managed by the Price BLM office that are not within proposed wilderness areas, why can't BLM prohibit such use in these areas?	Please see general comment responses #12, #36 and #144
Gary	Zvitt	OHV Route	In the last several years, my sons and I have witnessed degradation by ORV use in the Swell and by Factory Butte. ORV use has run amok in these areas. ORV tracks seem to be everywhere you look and ruin the scenic	Please see general comment responses #12, #15,

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		Identification	view. My sons and I have been disheartened by this wanton destruction. Surely the BLM must recognize that ORV use is now out of control. Is this the best and wisest use of the land? I urge you to impose limitations on ORV use. No areas should be designated as "open areas" without limitations. Specific trails should be designated with enforceable rules of the road that control use. I also urge you not to designate any trails for off-road vehicles on lands within America's Redrock Wilderness Act.	#19 and #144
Gary	Zvitt	OHV Route Identification	I favor a balanced approach to land use, such as proposed in the Castle Country Heritage Plan. This plan protects lands included in America's Redrock Wilderness Act from oil and gas development and from ATVs, dirt bikes and other off-road vehicles, but also includes reasonable opportunities for these activities to take place. None of the land use alternatives described in the draft Price RMP adequately meet these objectives.	Please see general comment responses #12 and #35