Comment Letter 31

Mobil Alternative Energy Inc.

P.O. BOX 17772
DENVER COLORADO 80217

September 19, 1984

Mr. Curtis Tucker, Team Leader
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Comments on Draft Environmental Impact Statement for the Book Cliffs Resource Management Plan

Dear Mr. Tucker:

Mobil Alternative Energy Inc., appreciates the opportunity to comment on the referenced document. The BLM has greatly overestimated the air quality impacts caused by synfuel developments.

31.1 The air quality analyses for the Book CLiffs Resource Management Plan Draft Environmental Impact Statement (BCDEIS) are based on previously completed studies described in prior environmental impact statements. The prior analyses listed in attachment 1 used hypothetical development scenarios, crude emission factors, and inexact modeling approaches which were conservative. Mobil has submitted comments on the Federal Oil Shale Management DEIS and Utah Combined Hydrocarbon DEIS which describe in detail the weaknesses of these air quality analyses. The results of BLM's prior studies should be qualified in the BCDEIS as representing conservative worst-case analyses.

31.2 The BCDEIS described two significant air quality impacts associated with tar sands development in the PR Springs area. These were projected exceedances of the Class II PSD increment for total suspended particulates and predicted occurrences of visible plumes. Both of these impacts are overestimated. Based on analyses performed for the Utah Combined Hydrocarbon EIS, the BCDEIS projects violations of the PSD Class II particulate increment due to tar sands surface mining in the P.R. Springs area. In the BCDEIS (p. 141), however, BLM states that surface mining in P.R. Springs will be much smaller than estimated in the Utah combined Hydrocarbon Regional EIS. Other forms of tar sands extraction result in much lower emissions of particulate; therefore TSP concentrations will be much lower than projected in the BCDEIS.

31.3 The BCDEIS projects discoloration due to plumes at the Uintah and Ouray Indian Reservations and at the Dinosaur and Colorado National Monuments for the commodity production and balanced use alternatives. These projections are

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31.1 The impacts presented in this document are "worst case" predictions. Refer to Air Quality Assumptions, page 146 of the DEIS. This has been done to comply with the National Environmental Policy Act.

31.2 See Response 31.1. The BLM recognizes that the impacts to air quality would be less than stated if the development of tar sands occurs using recovery methods other than surface mining. However, since there are no specific proposals for development at this time, the "worst case" projections were presented.

31.3 See Responses 31.1 and 31.2. Refer to page 146, "Air Quality Assumptions" for the listing of the sources used, including the Utah Combined Hydrocarbon EIS. A single plume analysis for tar sand development was used as a worst case because without specific proposals, there is no assurance that the project NO_x emissions will be spread.

When specific applications for development are received, more accurate predictions can be made and analyzed in future environmental documentation.

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apparently also based on the analysis conducted for the Utah Combined Hydrocarbon EIS. These impacts are grossly overestimated because the previous study assumed "that all projected NO_x emissions within the P.R. Springs area were combined to form a single plume" (Aerocomp, 1984, p. I-112) when in actuality these emissions will be dispersed over a wide geographic area.

We hope our comments will be helpful in preparing the final EIS.

Sincerely,

G. L. Higgins, Jr.

G. L. Higgins, Jr.
Hydrological & Environmental
Affairs Manager

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Attachment 1

1 Systems Applications, Inc., 1983 - Final Air Quality Technical Report for the Uintah Basin Synfuels Development Environmental Impact Statement. Prepared for the Bureau of Land Management by Systems Applications, Inc.

2 Bureau of Land Management, 1983 - Utah Combined Hydrocarbon Environmental Impact Statement, Richfield, Utah.

3 Aerocomp, Inc., - Final Air Quality Analysis for the Combined Hydrocarbon EIS, Eastern and South-Central Utah. Prepared by Aerocomp., Inc., for the Bureau of Land Management, Costa Mesa, California.

4 Bureau of Land Management, 1983 - Federal Oil Shale Management Program Draft Environmental Impact Statement, Denver, Colorado.

5 Dietrich, D. L., Fox, D. G., Wood, M.C., and Marlott, W. E., 1983 - Draft Air Quality Technical Report for the Federal Oil Shale Management Program. Prepared by Air Resource Specialists, Inc. for the Bureau of Land Management.

6 Aerocomp., Inc., 1984 - Ibid.

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STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114

SCOTT M. MATHESON
GOVERNOR

September 27, 1984

Mr. Curtis Tucker
Book Cliffs Resource Management Plan Team Leader
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr. Tucker:

The Resource Development Coordinating Committee has reviewed the Draft Book Cliffs Resource Management Plan/ Environmental Impact Statement. The state appreciates the tremendous effort that is required to produce such a complex and involved document. It is an important effort in that the document will serve as the foundation for future Bureau of Land Management (BLM) management decisions, as well as a guide, for the public, that reveals the manner by which the land will be managed for the foreseeable future.

Because of the significance of the document, it is essential that it be informative and accurate. In several essential areas the document does not contain a complete enough analysis or provide enough information for the state to make an informed decision on the effect of choosing one alternative over another. These shortfalls are detailed in the attachments. Until the state is provided with more complete information, we cannot at this time support the document or any of the proposed alternatives.

We hope that the state's specific comments will be useful to the BLM in its efforts to accurately and informatively represent the resources and opportunities for management of the Book Cliffs Resource Area. The state is supportive of the Resource Management Plan (RMP) process and is hopeful that its participation in the process will further thoughtful land planning and management.

Sincerely,

Governor

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GENERAL COMMENTS

Right-of-Way Corridors

The state believes that corridors based on both need and environmental considerations can fulfill several objectives--including the one stated in the *Resource Management Plan/Draft Environmental Impact Statement* (RMP/DEIS): "If corridors could be located in areas that are void of other resource conflicts, the time required for issuance of rights-of-way could be significantly reduced" (page 6). The RMP/DEIS however does not provide enough information
32.1 to determine whether this objective would be met by any of the alternatives.

32.2 In the effort to minimize resource conflict, the need for corridors should be accommodated with as few corridors as is reasonable. It appears that the DEIS has made no attempt to assess the minimum number and extent of corridors needed to allow for development. The only references to assessments of need are based on supposition rather than demonstrated need, e.g. "It is anticipated that mineral development, within the Book Cliffs Resource Area (BCRA), would increase demand for rights-of-way to accommodate roads, energy and water pipelines...etc." (page 6). *A more detailed needs assessment should* be developed.

32.3 *In addition to a deficiency in demonstrated need*, the DEIS falls short in presenting the resource conflict information in a manner that aids the reader in making a determination regarding the extent to which resource conflicts are being avoided in each corridor. Appendix 9 contains the essential information, but needs to be carried a step further. The Environmental Impact Statement (EIS) should contain a table with the following information: a legal description of each proposed corridor, if it is an existing Right-of-Way (ROW), the number of acres within that corridor with wildlife, watershed, recreation or woodlands value conflicts. In addition, a summary table should be prepared which lists for each alternative the proposed corridors, and conflicting resources by type and acreage.

Minerals

Oil Shale: The DEIS states that a decision needs to be made as to the "...number and locations of priority use areas for oil shale leasing" (page 6). Oil shale priority management areas have been established in the document for the Balanced Use, Commodity Production and Resource Protection alternatives. The DEIS indicates that direction for establishment of the priority management area came from the DEIS for the Federal Oil Shale Management Program (page 94). According to that document's proposed alternative, establishment of priority management areas would be a two-stage process: identification of potential reserves that "...would then be evaluated in light of other potential land uses so that areas of compatible and conflicting land uses could be identified" (page 1-10, Oil Shale DEIS).

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32.1 The Federal Land Management Policy Act (FLPMA) of 1976, made provisions for the designation of corridors through land use planning. *The purpose of a corridor is to channelize future rights-of-way into* logical and environmentally acceptable areas. This designation helps to reduce the proliferation and environmental disturbance of unplanned *rights-of-way. The opportunity exists to designate preferred* areas for future rights-of-way, as well as certain exclusion areas where rights-of-way would be prohibited.

32.2 Right-of-way applications are processed on a regular basis in the BCRA. These rights-of-way are related primarily to energy projects and include projects such as power and transmission lines, various types of pipelines, roads, and others. The processing of rights-of-way is expected to continue well into the future unless a demand for energy products ceases to exist.

Minimizing or eliminating the designation of corridors would have no effect on the number or type of future rights-of-way. The elimination of corridors would result in greater disturbance over wider and more environmentally sensitive areas. Designation of corridors will help concentrate the disturbance into environmentally acceptable and *logical locations and should minimize environmental impacts.* See Response 17.83.

32.3 The 24 pages of information presented in Appendix 9 were developed for two reasons. First, the data can be used by the public in making informed comments about a particular corridor segment. Second, the BLM decision maker can use the information to rapidly assess any potential resource conflicts and thus make an informed decision on the proposed Book Cliffs RMP and future rights-of-way.

Identification of approximate acreages of wildlife habitat, or other resource values, can be calculated by using the average corridor width of 0.6 mile (refer to page 99) and multiplying it by the length of a resource segment (Appendix 9) and converting square miles to acres. Calculation of these acreages and determination of the legal descriptions would be a costly unnecessary procedure for this step of the planning process.

Refer to Figure 2-5 for the locations of existing right-of-way corridors.

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32.4 There is no indication in the DEIS that that process has been applied. The only information that the DEIS reveals are maps that display the selected management areas for each alternative. In order for the state to evaluate the desirability of each alternative the following information is needed: the criteria that selection of the areas was based on, e.g., are the selections based on expressions of interest, or other rational; are the areas free from resource conflicts--if there are conflicts present what are they and to what extent will the resource values they represent be affected under each alternative.

32.5 Oil and Gas: The state finds no problem with the application of the oil and gas category system in the land planning stage as a method to minimize resource conflicts at the developmental stage. However, the DEIS does not contain enough specific information on how the category designations were arrived at for the state to understand the relative merits of each alternative. In addition to figures 2-1, 2-8, 2-15 and 2-23 the DEIS needs to provide more detailed information. For example, instead of stating on page 14, column 2, paragraph 5 that: "Resource values totaling 186,000 acres and requiring special mitigation for protection (Category 2) would include: critical antelope, deer, elk, and wild horse range...and the scenic corridor along U.S. Highway 40...", the reader should be provided with a legal description of each proposed specially protected area and the number of acres required for each category within each alternative. As the document now reads it is impossible to know the number of acres protected for sage grouse leks as compared to either wetlands or wild horse range. It is also difficult to determine whether any of the designations are adequate or too high for any of the alternatives.

Tar Sands: A similar problem exist for the tar sand category designations as that outlined above for oil and gas, i.e., lack of specific information and rational to support the category designations. The DEIS states that the analysis of assignments of leasing categories "...is similar in scope to the categorization of the Special Tar Sand Areas (STSAs) throughout the state within Volume II of the Utah Combined Hydrocarbon Leasing EIS."(page 94). The Utah Combined Hydrocarbon Leasing Regional Final EIS contains a much more detailed analysis of the category designations. For example, the analysis of the Sunnyside and Vicinity STSA in that Final Environmental Impact Statement (FEIS) identifies each area proposed under each category, the number of acres involved, and a description of the resource (page 70, FEIS). Without that type of analysis in the DEIS the state cannot make a judgment on the desirability of any of the alternatives.

32.6 The state is also concerned with the application of oil and gas stipulations to tar sand development. Specifically, would oil and gas stipulations adequately cover tar sand development impacts that progress beyond the drilling stage? If they would not, what measures will be taken to protect sensitive resources for the duration of tar sand development? Using the Utah Combined Hydrocarbon Leasing Regional FEIS as a guide, the Bureau of Land Management (BLM) should specifically identify what stipulations would be attached for each area proposed for categorization.

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32.4 The process described has been applied within the development stages of the RMP.

The quality and quantity of different oil shale reserves is represented in barrels per acre, as shown in Figure 3-3. Known Oil Shale Lease Areas are shown in Figure 3-4 and a general expression of interest is shown in Figure 3-5. This and other information (refer to the bibliography) was compiled to delineate a high potential area for future oil shale development.

The area was then analyzed in relation to competing land uses, see Figures 2-6 and 3-9 through 3-17. For example, a conflict existed between recreation, wildlife, and watershed values and potential oil shale development along the White River Corridor. This area was subsequently removed from further consideration as a priority management area (see Figures 2-9, 2-16, and 2-24).

32.5 Appendix 4 has been revised in the FEIS to provide an explanation of the oil and gas category system.

The basic framework for category designations is presented within the RMP. This framework is discussed in Chapter Two under the alternative oil and gas, and tar sands discussions and shown in Figures 2-8, 2-10, 2-15, 2-17, 2-23, and 2-25. These category designations are based on consideration of various resource values as shown in Figures 2-6 and 3-9 through 3-17, with accompanying discussions in Chapter Three.

The development of specific mitigation measures in relation to legal descriptions was not completed within the RMP for three primary reasons:

A. The basic resource data has gone through revisions during the RMP process; for example, note the revisions you have submitted for wildlife habitat. These types of changes would result in extensive document revisions.

B. Special mitigation measures are described for 40-acre subdivisions. The complexity of presenting the various mitigation measures throughout the entire Resource Area for the four alternatives would require extensive and unnecessary data compilation.

C. The final category system will include both tar sands and oil and gas mitigation measures (see Appendix 4). This system is complex and difficult to present.

The development of the special mitigation measures for specific legal subdivisions will occur during an activity planning process subsequent to implementation of the RMP. These descriptions will be based on the framework laid out in the proposed RMP (refer to Table 2-1). This information will be forwarded to the BLM State Office to be used for lease issuance. Duplicate copies will be retained in the BLM Vernal District Office and will be available for public inspection.

32.6 Appendix 4 contains a discussion of mitigation for oil and gas and tar sands.

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Land Tenure Adjustment

32.7 Again, the lack of detailed information on categorization of lands makes an evaluation of the alternatives difficult. In the area of land tenure adjustment, a description of the lands that BLM is interested in acquiring or disposing of should be listed, including: a legal description, acreage involved, and a description of the resource and its value.

Socioeconomics

32.8 In general, the Environmental Impact Statement for the Bookcliffs Resource Management Plan meets the minimal socio-economic analysis that is standard in Bureau of Land Management documents. The "Affected Environment" section gives a fairly good synopsis of existing conditions from the 1983 Uintah Basin Synthetic Fuels Environmental Impact Statement, although data in several areas could have been updated. In addition on page 127 the report states that the State of Utah Community Facility Guidelines does not include a standard for solid waste disposal. This is in error; the standard is .21 acres per 1,000 persons.

In chapter 4, the document points out the difficulty in forecasting socio-economic impacts for the area because of the uncertainty surrounding the development of synfuels in the area. In addition the lack of a complete fiscal analysis of the alternatives make it difficult to determine the ability of the local communities to absorb the projected growth under the various alternatives. This complaint, however, would apply to all BLM socio-economic analyses that the reviewers are familiar with. Although the analysis is relatively weak, there appears to be no overriding issue that would contraindicate any of the proposed alternatives of management.

Water Resources

32.9 In the discussion of the individual alternatives (Chapter 4), it is extremely difficult to ascertain the breakdown of projected water use which is applicable to each alternative. Information critical to specific alternatives is not always included in the section discussion of those alternatives. For example, the discussion of water use for the Current Management Alternative (page 156) makes no mention of the fact that the high level scenario for synfuels development (77,000 acre-feet) is used; this comment is made in a general section on page 145. Again, Table 4-12 (page 167) has information pertinent to all alternatives, but is referred to only in the Resource Protection Alternative (page 166), and then without sufficient explanation as to how the table is to be used. We recommend that this water use information be pulled together into a cohesive and lucid package, clearly delineating the developments and associated water use assumed under each alternative.

32.10 Salinity reduction through watershed treatment is an implied objective of all of the alternatives, but not mentioned specifically. Because of the importance of salinity control in the Colorado River Basin and past involvement of the Bureau of Land Management in activities of the Colorado

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32.7 Exact locations of lands identified for acquisition or disposal are shown in Figures 2-7, 2-14, and 2-22. Refer to pages 60, 69, 70, 71, 120, 157, 168, 185, and 201 of the DEIS for further discussion of these lands.

32.8 Thank you for the additional information about solid waste disposal standards. It has been added to the text of the FEIS.

32.9 The text has been revised to reflect your concerns.

32.10 The Colorado River Basin Salinity Control Act referred to on page 76 of the DEIS, was intended to imply involvement of the Colorado River Basin Salinity Control Forum.

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River Basin Salinity Control Forum, we feel that such formal recognition would be appropriate. Inclusion of a related statement would also be desirable in the Soil, Water, and Air section on page 73.

32.11 In the Water Quality and Soils sections of each alternative discussion (Chapter 4), impacts of water development on salinity levels of the Colorado River are quantified, but impacts of watershed treatment are not. In a similar report (Grand Resource RMP and Final EIS), such impacts were quantified (page 2-1); we feel that such analysis would be desireble in the Book Cliffs RMP and EIS. The paper, "Salinity Control Projects: Eastern Utah," published by the Denver Service Center (BLM) in May 1982, might be helpful in this regard. Also, it is our understanding that a soil survey of Uintah County is currently being conducted by the Soil Conservation Service. This survey will contain specific information related to salinity.

COMMENTS BY PAGE NUMBER

Chapter Two

32.12 Page 14, Column 1, Formulation Criteria: The BLM should include a more specific list of criteria for guiding the resolution of each issue in lieu of the general criteria contained in the DEIS. Each issue has unique parameters which should be acknowledged. At a minimum, an additional general criterion should be added which reflects consideration of the effect that a proposed management decision would have on adjacent public lands and public land users as well as coordination with federal, state and local plans and regulations.

32.13 Page 20, Column 4, Paragraph 2 and Page 26, Column 4, Paragraph 1: The management or existence of wildlife should not be dependent on anticipated conflicts with livestock. Potential conflicts exist on the BCRA. This statement provides a convenient loophole to relegate wildlife needs to the lowest priority. The statement "...wildlife habitat would be managed for optimum levels where conflicts with livestock do not exist..." should be deleted from the text.

32.14 *Page 26, Column 4, Paragraph 2: The DEIS states that the Balanced Use* Alternative will "[p]rovide forage to support 17,300 deer, 1900 elk, 900 antelope". The EIS should specify whether these figures are for BLM land only or unit wide. If for BLM land only, they are okay, if unit wide, they are far too low.

32.15 Page 25, Column 4, Paragraph 1 and Page 117, Column 2, Paragraph 2: The Balanced Use Alternative proposes to protect 470 acres of floodplains, stating that these 470 acres are in "poor ecological condition". The document should define "poor" ecological condition. It is the Division of Wildlife's opinion that nearly all the floodplain/ riparian zones in the BCRA are in poor ecological condition for the following reasons:

BLM Letter Response

32.11 See Response 29.10.

32.12 Additional criteria have been identified in the FEIS. See Responses 17.34 and 29.5. This document has attempted to indicate the significant impacts that would result on Federal and non-Federal lands as is required by NEPA. Coordination with Federal, State, and local plans is required in the 43 CFR 1600 regulations. This has been done. Refer to Appendix 1 and page 9, Consistency Review. Compliance with appropriate laws and regulations is mandatory and can be considered to be formulation criteria even though they are not specifically listed.

32.13 Wildlife populations will be optimized where possible, based on the results of an intensive five-year monitoring period, in cooperation with the Utah Division of Wildlife Resources. Appropriate stocking levels (livestock and wildlife) will be determined at the conclusion of the studies.

32.14 This RMP proposes management of Federal lands only. This is stated on page 3 of the DEIS under, "Scope of the Resource Management Plan".

Also, refer to pages 103 and 145 of the DEIS which state that forage allocations are based on Federal lands only.

32.15 The term "poor ecological condition" is defined in the Glossary under "Ecological condition". Limiting or restricting livestock on the 470 acres referenced is but one proposed action to improve floodplains. Refer to page 32 and Figure 2-6 of the DEIS which indicate that watershed treatment measures will be made on approximately 78,900 acres. The specific locations will be determined during the activity planning process. The areas you indicate are included in Figure 2-6.

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1. Cottonwood groves along the Green and White rivers are, for the most part, old and decadent with little regeneration of new trees.

2. In some areas, salt cedar encroachment is threatening to replace valuable cottonwood and willow communities.

3. The four perennial streams in the BCRA have experienced severe channel erosion and downcutting. This has lowered the water table and allowed dense stands of grease wood and big sage to invade. Riparian habitat is confined to an extremely narrow band along the margin of the stream course.

32.16 Additionally, the "Balanced Use Alternative" will provide for, and encourage, the harvest of cottonwood trees on 300 acres (page 28, column 4, paragraph 3). Given the factors working against cottonwood survival and regeneration, such a management scheme could only produce a deleterious effect on overall riparian communities.

32.17 Page 25, Column 1, Paragraph 2: The context of the paragraph leads one to believe that fawning occurs only in Main Canyon. This is misleading. It should be clarified that fawning occurs across the entire summer range, not just Main Canyon.

32.18 Page 65, Tar Sand: The "Balanced Use Alternative" proposes 110,000 acres of tar sand be leased under Category 1 (standard stipulations). Large portions of winter and summer range are found within Category 1 areas that are available for tar sand leasing--including high use areas such as Indian Ridge, Big Park, Wood Canyon, Agency Draw; Summer Range--from Seep Ridge to the Roadless Area. Two sage grouse strutting grounds also fall within Category 1 areas (see figures 2-25, 3-11, 3-12, 3-13). How will "standard stipulations" specifically relate to, and protect, these habitats for the duration of tar sand development? (Please refer to the tar sand comments under general comments above.)

32.19 Page 78, Paragraph 2: This should be clarified to specify if wildlife increases are on BLM land only or unit wide.

Chapter Three

32.20 Page 103, Big game: The text freely uses the term "crucial" without defining it. It is erroneous to designate the entire summer and winter ranges in figures 3-10, 3-11 and 3-12 as crucial habitat. High use areas exist within the larger delineations which could indeed be termed "critical" use area. Big game are not equally distributed across their ranges and the high use areas within these ranges should be identified. The information is available from a recently completed Division of Wildlife Resources (DWR) study on the Book Cliffs that was developed in cooperation with the BLM.

BLM Letter Response

32.16 On a broad basis, we agree that harvesting and subsequently attempting to regenerate cottonwood would be difficult and unwise. However, the stands selected have special conditions: They were burned by wildfire four years ago, and were flooded during 1983 and 1984. The objective is to protect the existing natural regeneration, conduct thinning, control the invading vegetation, and harvest a second crop of trees, if feasible. These stands could be considered to be a trial management area because only 300 acres out of a potential 3,000 acres were selected.

Among local residents, there is a strong demand to harvest cottonwood for firewood, especially during winter months when areas at higher elevation are closed by snow. If this stand can be managed successfully, it will help supply winter firewood and pave the way for including additional river bottom acreage for sustained yield management.

32.17 The BLM concurs that fawning occurs in areas throughout the summer range. The reference to Main Canyon that you cited could not be located.

32.18 Two sage grouse leks fall within the PR Spring STSA. These leks have been placed into Category 3 (No Surface Occupancy). They were not placed into Category 1 as stated.

Wildlife habitat placed into Categories 2 and 3 are listed on page 65 of the DEIS. Refer to Appendix 4 (revised) for the proposed mitigation.

32.19 See Response 32.14.

32.20 The term crucial is adequately defined on page 213 of the DEIS under "crucial range". The entire summer and winter ranges utilized by deer and elk are NOT designated in Figures 3-10, 3-11, and 3-12. Only the crucial areas were delineated (with the assistance of UDWR personnel from the Northeastern Regional Office in Vernal). High use, and fawning/calving areas for mule deer and elk, respectively, have been indicated on the revised figures for the FEIS, with the assistance of Jim Karpowitz, UDWR.

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32.21 Pages 106, 107 and 110: The big game range maps on these pages are totally inaccurate.

Figure 3-10: The map of antelope range should be expanded westward to the breaks of Willow Creek. Also, antelope occur on Blue Mountain.

Figure 3-11: The deer summer range shown is much too large. High use areas are much smaller than shown. The deer winter range is much too small. Some wintering areas have not been delineated. Fawning habitat, as shown, is completely inaccurate. Fawning habitat should coincide with those areas of summer range identified in high use areas. Yearlong range, as shown, is inaccurate.

Figure 3-12: Elk summer range is too large. High use areas are much smaller. Elk winter range is too small and is also difficult to identify. Summer range and winter range are continuous. Calving areas are inaccurate. They too should coincide with the high use summer range. Locations of burns and chainings is incomplete and should be identified as high use wintering areas.

Attached are Figures 3-10, 3-11 and 3-12 that have been corrected for the above inaccuracies. The maps contained in the DEIS are not acceptable. The acreages on page 103 and table 3-2 need revision to reflect the changes of the corrected maps.

32.22 Page 108, Column 1, Paragraph 2: The DEIS states that "UDWR population goals for elk are 2,300 head...". This statement must be clarified for BLM lands only.

32.23 Page 108, Upland Game: This section of upland game is incomplete and inadequate. There is no discussion of sage grouse on Blue Mountain. Tremendous effort has gone towards chukar transplants to re-establish this species in the BCRA. Transplant sites are identifiable. This minor paragraph downplays the importance of upland game and waterfowl as well as their respective habitats. It also underestimates the seriousness of potential impacts anticipated under each alternative.

32.24 Additionally, there is no discussion of the nongame resource in the BCRA. This is not acceptable. Several of these species are of high state and federal interest: Western Bluebird, Sandhill Crane, Long-billed Curlew, Golden Eagle, Prairie Falcon, Cooper's Hawk, Ferruginous Hawk, Great Blue Heron, Burrowing Owl, Flammulated Owl, and Lewis' Woodpecker.

Facts of note on these include: (1) The burrowing owl is being considered for the federal threatened or endangered species list. (2) Golden eagle nests are not discussed or identified. Several active nests occur within the BCRA. (3) Observations have shown that the Book Cliffs, and particularly the Bitter Creek drainage, serve as a major flyway for sandhill cranes. Sandhill's have been seen on the ground at McCook Ridge.

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32.21 The wildlife maps have been revised in the FEIS and the acreages and Table 3-2 have been amended to reflect the changes.

The BLM is aware that the National Park Service released antelope within the boundary of the Dinosaur National Monument in 1981.

32.22 See Response 32.14.

32.23 Resources within this document have been discussed at a level commensurate with the degree or severity of impact. Refer to page 137 of the DEIS. The BLM concurs that these species are important; however, with mitigation, no significant impacts are anticipated.

The discussion of sage grouse has been made on a general basis for the entire resource area. Sage grouse leks are shown in Figure 3-13. The location of the chukar transplant sites is not considered to be essential for this phase of planning.

32.24 The nongame wildlife resource is important in the BCRA. A recently compiled species list for the BCRA is available in the Vernal District Office, and includes nongame birds and mammals, and herpetofauna. Appropriate mitigation will protect these species (Appendix 4).

The BLM has responded to the official US Fish and Wildlife Service list of Threatened and Endangered species, and candidate species for listing. This information has been included in the DEIS.

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32.25 There is also no discussion or list of nongame fish or herptofauna. The DEIS should discuss the brook trout fishery in the upper portions of Bitter Creek. The DEIS is incomplete without a discussion of nongame, especially the eleven species listed above.

Chapter Four

32.26 Page 198, Wildlife/ Wild Horses, BLM Impacts: The DEIS states on page 199 that "The combined effects of oil and gas, oil shale, and tar sand development, coupled with increases in livestock production, would be significant." This is an incredible understatement of the significance of potential mineral development given that the Balanced Use Alternative allows 605,000 acres for oil and gas leasing--standard stipulations, 413,000 acres for oil and gas leasing--special stipulations, no lands closed to oil and gas leasing, 42,000 acres for underground oil shale mining, 6,000 acres for in-situ development, 110,000 acres for tar sand development--standard stipulations, 68,000 acres for tar sand development--special stipulations, and 93,000 acres for new right-of-ways corridors.

It is difficult to perceive stable livestock numbers and increased wildlife numbers in the face of such development. This should be emphasized and elaborated upon. The effects of energy development could be catastrophic depending on the rate and location of development.

32.27 There is no discussion of impacts to sage grouse on Blue Mountain or the Book Cliffs. There is also no discussion of impacts to other upland game species or waterfowl.

32.28 As in Chapter 3, there is absolutely no analysis of impacts to nongame. Only endangered fish are discussed. Woodland harvesting will have an effect on lewis' woodpecker and bald eagles which depend on cottonwoods to roost and exploit the Green and White rivers. No discussion of impacts to golden eagle nests or any of the other eleven high state and federal interest species have been presented.

32.29 There is no discussion of indirect impacts, i.e., increased population and housing growth. Table 4-25 presents a change in household growth over baseline. Such expansion will require the conversion of agricultural and other lands. This will eliminate pheasants, quail, waterfowl and possible sandhill crane/ whooping crane habitat.

32.30 Mitigation is superficially dealt with, and is not adequate to deal with anticipated impacts and losses. Mitigative measures should be specifically outlined.

BLM Letter Response

32.25 Herpetofauna and nongame fishes are not discussed in the RMP because impacts to these species are not significant (see page 137 of the DEIS, Introduction). The same not is true for the very small portion of Bitter Creek under BLM jurisdiction.

32.26 The impacts quoted here are worst case, should all the developments occur simultaneously at their maximum levels. Refer to Appendix [illegible]. It is believed this is unlikely to happen.

32.27 Impacts to sage grouse populations on Blue Mountain, East Bench, Winter Ridge, and the Bonanza and PR Spring areas would be insignificant. This is based on the buffer zone surrounding known leks and mitigation provided (Appendix 4, revised). Other upland game bird species and waterfowl would also not be significantly affected given the amount of surrounding suitable habitat. Opportunities for significant population expansion would probably be limited, should the projected degree of development occur simultaneously. Generally speaking, the BCRA itself receives limited waterfowl use. Displaced birds would most likely shift their activities to adjacent habitat outside the BCRA (the Green River, Stewart Lake, Pelican Lake, Pariette Waterfowl Area, etc.). The net overall change in number of broods produced is not considered to be significant.

32.28 Impacts to nongame wildlife are not projected to be significant based on the various development scenarios presented. In the introduction to Chapter Four, on page 137 of the DEIS, it was stated that impacts are discussed at a level commensurate with the degree of severity of impact. Therefore, impacts to nongame species are not presented in any detail.

Displacement would occur as development proceeds, but the majority of nongame wildlife would shift to adjacent habitats.

Also on page 137 of the DEIS, under general assumptions, it was stated that "All (BLM) actions would conform with existing laws, including protection of ... endangered and threatened species". The BLM has responded to the official US Fish and Wildlife Service list of threatened and endangered species in addition to those candidate species. The BLM will consult with the Utah Division of Wildlife Resources and the US Fish and Wildlife Service on specific projects, as they develop, through the Environmental Analysis (EA) process.

32.29 BLM agrees that no impacts (indirect) were discussed with regard to increased population/housing growth. Without specific information pertaining to population and housing growth (where located, degree of growth, etc.) the amount of indirect impact to pheasant, quail, waterfowl, and crane habitat cannot be addressed.

32.30 Refer to revised Appendix 4 for specific mitigating measures. Additional mitigation for habitat disturbance or loss will be addressed in future Habitat Management Plans (HMPs) and mining plans.

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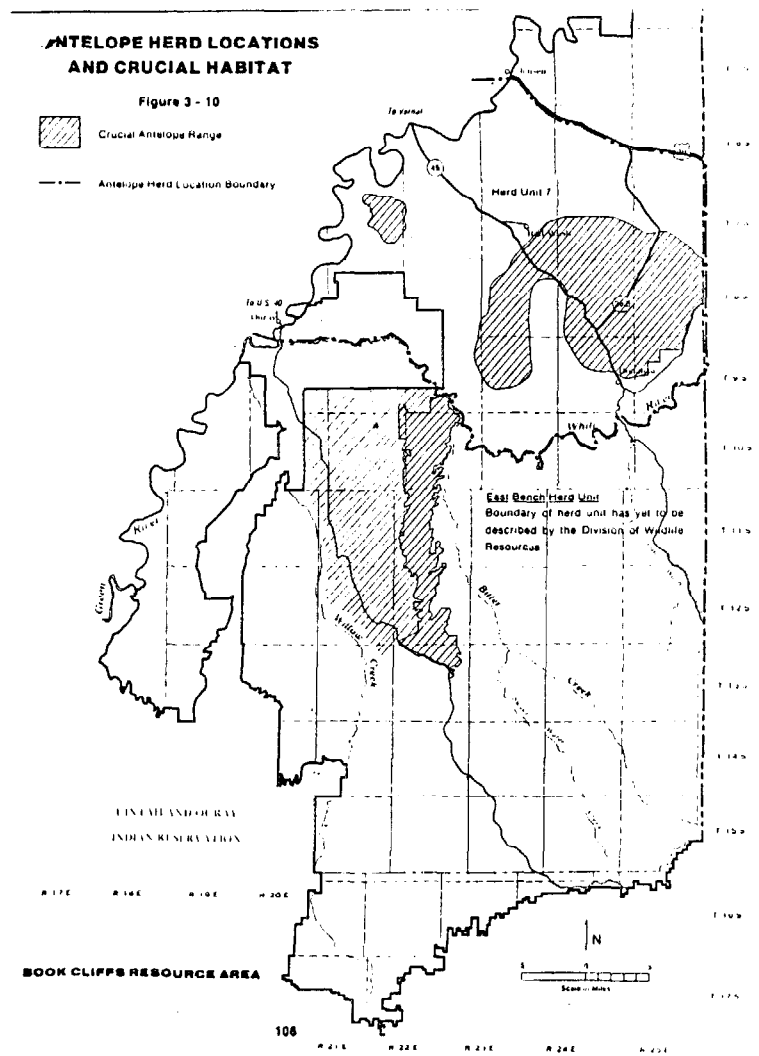

BLM Letter Response