

Harvey C Woodward  
 73432 Hwy 64  
 Medley, Colo, 81641

Mr. Curtis Tucker  
 Bureau of Land Management  
 170 South 500 East  
 Vernal, Utah, 84079

Re: Environmental Impact Statement  
 Specific: Book Cliff Resource Area and Stateline allotment.

Dear Sir:

This comment is being written as a permission and trying to be open to all ideas and opinions. This statement has been prepared over an extremely large area and I feel for the most part a good job has been done, but as expected there are many different opinions as to the best way to manage the Book Cliff Resource Area.

Any time we manage any area for only one particular purpose; i.e. livestock, wildlife, plant species, mineral resource, we are not allowing that area to achieve its full potential. However, when hostile attitudes are put aside and all different concern groups can work together and maximum utilization of our land resources can be achieved. It is my sincere hope that one day this balance in attitude may be common place.

I for one am glad to see this E.I.S. prepared and I'm really pleased with overall analysis of range lands. I agree that there must be a balance in use and improperly managed livestock can disrupt the tender balance in return. However, it's been proven that properly

Thank you for your comments. Your views will be given consideration in making the final decision on the Resource Management Plan.

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BLM Letter Response

managed livestock grazing can have just the opposite effect and improve range conditions. Proper management does not always include reduction in numbers but also such techniques as; rest rotations, Quick over frequent returns, and interspersed numbers on small areas with careful observation and alter rotation. Proper management also means keeping up with technology and using new methods of management and plants such as the new High Crest about grass.

As a permittee I'm concerned about accusations of the effect that livestock grazing has on certain plant species. It must be remembered that wildlife also has an impact on range conditions, and because of acquired taste or environment some have been affected on the so called endangered plants. I'm not qualified to judge in this area but request that fairness be applied in analyzing damage and improvement in this area of concern.

Please keep us posted on all new developments. Let's all work together and figure out what's best for everyone concerned. Working together we will accomplish the goal. Fighting each other will destroy the balance in nature.

Sincerely yours,  
 Allison C. Ueberlind

Atlantic Richfield Company Government Relations  
555 Seventeenth Street  
Denver, Colorado 80202  
Telephone 303 575 7577  
Public Lands



September 11, 1984

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

Re: Book Cliffs Resource Area  
Draft Environmental Impact Statement and  
Resource Management Plan

Dear Mr. Tucker:

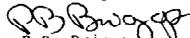
Atlantic Richfield Company appreciates the opportunity to comment on the referenced report. Through its operating divisions, Atlantic Richfield is interested in the oil and gas, oil shale and coal potential of the Book Cliffs Resource Area.

Because of our oil and gas interests, we are especially concerned with the 413,000 acres of the Resource Area which will require special lease stipulations under the Preferred Alternative. We have identified two areas on the attached map which we feel have moderate to high potential which should not be as encumbered with special stipulations as they are under this alternative. (Detailed information on these areas was sent to you in November, 1982, as part of the inventory stage of the planning process.)

In total, the Preferred Balanced Use Alternative has only 66,000 acres less under special stipulations than the Resource Protection Alternative. Please re-evaluate the need for these special stipulations in these two areas of oil and gas potential.

If you have any questions regarding our comments, please contact me at the above address or phone number.

Sincerely,

  
P.B. Briggs

Encl.  
PBB:jc

APR 1984

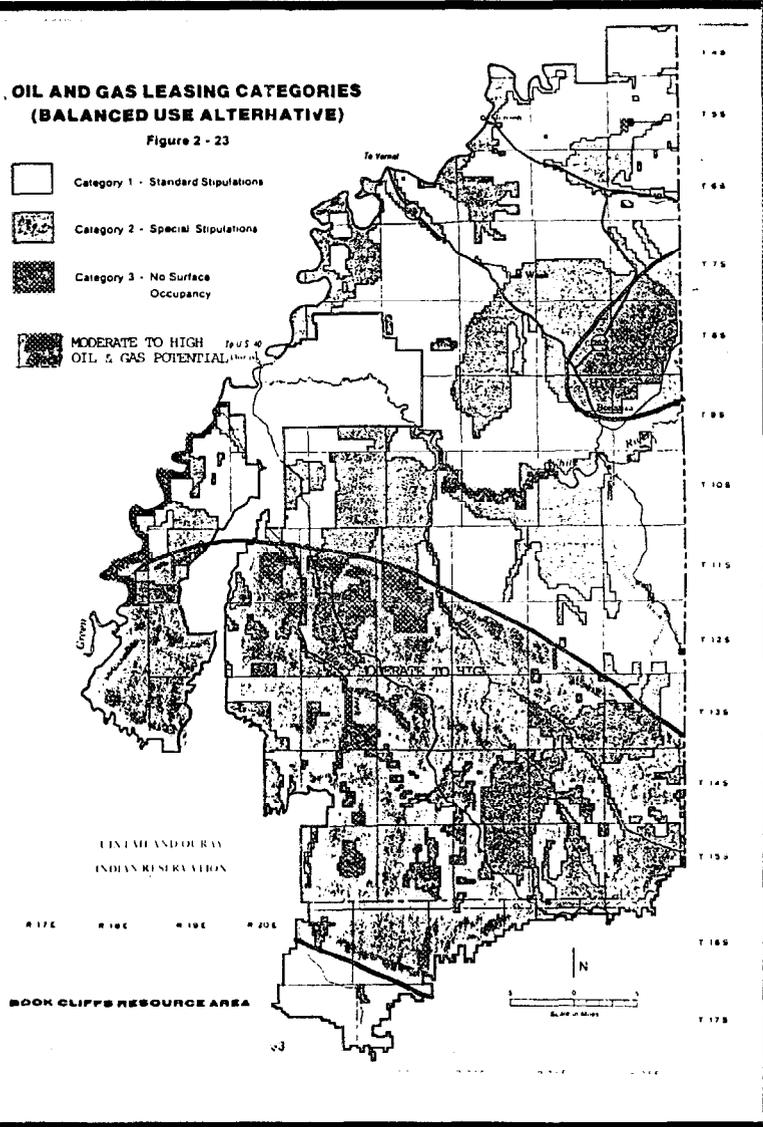
Thank you for your comments. Your views will be given consideration in making the final decision on the Resource Management Plan.

CHAP. 5 — PUBLIC REVIEW AND COMMENTS

**OIL AND GAS LEASING CATEGORIES  
(BALANCED USE ALTERNATIVE)**

Figure 2 - 23

-  Category 1 - Standard Stipulations
-  Category 2 - Special Stipulations
-  Category 3 - No Surface Occupancy
-  MODERATE TO HIGH OIL & GAS POTENTIAL



Comment Letter 23



DIVISION OF WILDLIFE RESOURCES  
DOUGLAS F. DAY  
DIRECTOR  
1596 West North Temple/Salt Lake City, Utah 84116/801 533 2311

Reply To  
NORTHEASTERN REGIONAL OFFICE  
671 W. 100 N., Vernal, Utah 84078 / (801) 789-3103

September 13, 1984

Lloyd H. Ferguson  
Vernal District Manager  
Bureau of Land Management  
170 South 500 East  
Vernal, Utah 84078

Dear Lloyd:

The Draft Environmental Impact Statement for the Book Cliffs Resource Management Plan has been reviewed and our comments formally prepared and forwarded. However, it is apparent that suitable habitat exists for the reintroduction of wild bighorn sheep and wild turkeys. We would like to call to your attention that the Draft Impact Statement is lacking in the treatment of these two species. We therefore request that the revised document include bighorn sheep and wild turkeys for consideration as potential additions to the current wildlife resource in the Book Cliffs Area. Future proposed releases would naturally go through the existing framework for approval.

Thank you for your assistance in this matter.

Sincerely,

Donald A. Smith  
Regional Supervisor

23.1

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BLM Letter Response 23

Thank you for your comment.

23.1 The plan has been amended to include this new data. Refer to Chapter 1, Management Concerns in the FEIS.

## Comment Letter 24



DEPARTMENT OF THE AIR FORCE  
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)  
630 SANSOME STREET - ROOM 1318  
SAN FRANCISCO, CALIFORNIA 94111

TO: ROV (Cox/556-6439)

SUBJECT: Resource Management Plan/Environmental Impact Statement (RMP/EIS), Book Cliffs Resource Area, UT

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

1. We appreciate the opportunity to comment on the subject RMP/EIS and we offer the following comments:

a. As you are aware, some of the Book Cliffs Resource Area has historically been subject to military overflights which should continue in the future. In the past, there have not been any problems between the Air Force and the Bureau of Land Management concerning potential conflicts between military overflights and wilderness designations. We, therefore, concur with any of the alternatives your agency designates, provided no restrictions are placed on military overflights in wilderness areas.

b. There are certain aspects of the alternatives mentioned which we would be less inclined to support because areas which are appropriate for military overflights and low altitude training routes are becoming increasingly rare. Desirable characteristics include: relatively isolated locations of sparse populations, areas presently under federal jurisdiction, diverse topography, and areas which lack heavy commercial activities such as mining.

2. Therefore, the Air Force supports the alternative (the Resource Protection Alternative) that disposes of the least amount of property, has minimum transmission lines, and does not allow an excessive amount of commercial activities. This support would be based on the condition that no restrictions are placed on military overflights. We appreciate this opportunity to comment on the RMP/EIS concerning the Book Cliffs Resource Area.

*Phillip E. Lammi*  
PHILLIP E. LAMMI, Chief  
Environmental Planning Division

24.1

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## BLM Letter Response

Thank you for your comment.

24.1 No restrictions of military overflights are proposed within this plan.

Comment Letter 25



721 Second Avenue  
Salt Lake City  
Utah 84103

12 September 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 entire impact statement addresses many different scenarios and alternatives in the development of the resources of the Book Cliffs Resource Area, including recreational opportunities on the White River. The scenarios themselves present problems associated with planning-- especially in view of the history of resource development in the Uinta Basin and oil shale country.

25.1 For instance, at one time the decision was made that all the water needed by energy developers in the Book Cliffs Resource Area was to come from the White River and not from the Flaming Gorge Reservoir, the Green River, or the Central Utah Project's water on the south slope of the Uinta Mountains. It is not known how this decision was made and what the rationale was behind this decision.

The repercussions of this decision is that water resources for the region can not be planned by the resource management team. At one time it was stated that there was interest in at least 140,000 acre-feet of water for energy development. The State of Utah's proposed White River Dam and Reservoir was to supply this water and this was to be the only water supply. The State determined that the dam would be built if it could presale 40,000 acre-feet of water. Presently there is only one oil shale developer (White River Oil Shale Company) who may need 20,000 acre-feet for full commercial development (Full commercial development of oil shale has not yet occurred because of technological breakdowns at the Union Oil retort center in Colorado). The State of Utah now considers that it would build the dam for this 20,000 acre-feet use. Does the Federal permitting process allow the construction of the dam and reservoir when the need is not justified? Will a new EIS be necessary to build such a big project (in terms of environmental and recreational losses) for so little water?

25.2 An example of overbuilding in the Uinta Basin and the Book Cliffs Resource Area has already occurred with the Bonanza Power Plant of Deseret Generating and Transmission Company (the same people who want to purchase the electricity from the White River Dam power plant). The EIS approved of two 400 megawatt units, the first to go on line in the near future. Presently it seems that

BLM Letter Response

25.1 The assumption that "all water needed for oil shale development would come from the White River" was made on page 145 of the DEIS. This assumption was made to enable an analysis of a maximum cumulative impact upon the White River and it's environment. The actual depletion of the White River could be much less than the figures that are presented in this document.

25.2 The White River Dam was discussed in the White River Dam Project Final Environmental Impact Statement (USDI 1982c). The BLM issued a decision which authorizes the use of public lands for that purpose on July 29, 1982. No additional environmental impact statements (including this document) will be prepared.

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BLM Letter Response

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less than 30% of the output of 400 megawatts can be sold. You should review my comments in the EIS on the power plant when I asked about the need for the electricity. The Federal agencies seem to rely to much on the stated "needs" of these projects by either the developers (from the free enterprise world) or by the developers (from the State of Utah).

Thus it seems that when it comes to planning one must consider the alternatives: 1) that development may not occur at a rate that justifies the White River Dam and Reservoir for water supply; 2) that the development may not be able to market its product once it is built; 3) that by the time the development occurs in an economic manner that the uses of the land may have a different value (as recreation or wildlife needs) and such uses may reflect a change in the attitudes of the public; and 4) that the Bureau of Land Management and other Federal agencies should not be too frivolous in granting permits to such enterprises. Certainly a 10 year lag and better assessment of demand and technology should be included in the EIS before any permits and rights-of-way are granted.

25.3

Perhaps to intercept any bad projects and to take the politics out of water resource planning, the Bureau of Land Management should require that the water supply for all developments at the commercial scale does not come from the White River and that the developers must build their own water supply system.

Sincerely,

*Peter Hovingh*  
Peter Hovingh  
Issues Committee  
Utah Nature Study Society

25.3

The projections of demand for rights-of-way corridors and other resources discussed in this Draft EIS are based upon the best data projections that are available. Any future projects that are determined to be inconsistent with this plan will require additional environmental documentation and a subsequent plan amendment for approval.



**Amoco Production Company**

Denver Region  
1670 Broadway  
P.O. Box 800  
Denver, Colorado 80201  
303-830-4040

Roberta Anderson  
Public Lands Coordinator

SEPTEMBER 13, 1984

MR. CURTIS TUCKER  
TEAM LEADER  
BUREAU OF LAND MANAGEMENT  
170 SOUTH 500 EAST  
VERNAL, UT 84078

DEAR MR. TUCKER:

AMOCO PRODUCTION COMPANY, A SUBSIDIARY OF STANDARD OIL COMPANY (INDIANA), SUPPORTS THE COMMODITY PRODUCTION ALTERNATIVE IN THE DRAFT EIS FOR THE BOOK CLIFFS RESOURCE MANAGEMENT PLAN. BECAUSE OF THE PROLIFIC NATURE OF THE BCRA IN TERMS OF EXPLORATION, DEVELOPMENT AND PRODUCTION OF OIL AND GAS, ALONG WITH THE POTENTIAL FOR FUTURE TAR SAND AND OIL SHALE DEVELOPMENT, IT SEEMS CLEAR THAT AN ENERGY MINERAL PRIORITY SHOULD BE ESTABLISHED FOR THE AREA. ALL OPTIONS FOR ENERGY DEVELOPMENT SHOULD REMAIN OPEN AND VIABLE.

IT ALSO SEEMS CLEAR, IN LIGHT OF YOUR PAST GOOD RECORD FOR DEALING WITH ENERGY PRODUCERS, THAT YOU HAVE SKILLED STAFF ABLE TO ACCOMMODATE A HIGH DEGREE OF MANAGEMENT FOR COMMODITY PRODUCTION. YOUR THOROUGH EXAMINATION OF THE BCRA'S RESOURCE POTENTIAL, AS REFLECTED IN THE PLAN, MAKES ONE OF THE MOST COMPELLING CASES FOR RESOURCE PRODUCTION WE'VE SEEN.

THANK YOU FOR THE OPPORTUNITY TO EXAMINE THE PLAN, AND FOR CONSIDERING OUR COMMENTS.

SINCERELY,

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Thank you for your comments. Your views will be given consideration in making the final decision on the Resource Management Plan.

EXXON COMPANY, U.S.A.  
POST OFFICE BOX 120 - DENVER, COLORADO 80201

EXPLORATION DEPARTMENT  
WESTERN DIVISION  
H. W. PHAETORIS  
MANAGER

September 14, 1984

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

Dear Mr. Tucker:

Exxon Company, U.S.A. is pleased to have the opportunity to review and comment on the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS) for the Book Cliffs Resource Area. Exxon has a strong interest in the planning process for federal public lands because many of these areas, especially in the resource rich Uinta Basin, have potential for additional discoveries and production.

We find it encouraging that the Book Cliffs Resource Area recognizes the significance of minerals, particularly oil and gas, as a multiple use resource. As you know, the Book Cliffs Resource Area and the Uinta Basin have had long established oil and gas production, mostly from Tertiary and Cretaceous age sediments.

We have closely examined your range of alternatives for their impacts on oil and gas exploration and development activities. The Bureau's maps of oil and gas favorability, oil and gas leasing categories, and known geologic structures received particular attention. These maps, in addition to those for tar sands, oil shale, and gilsonite, all indicate a strong probability for continued exploration and production activities.

Oil and gas exploration and development activities are not incompatible with livestock management, wildlife habitat, or recreational use. In most cases, the application of standard stipulations, in combination with today's sophisticated rehabilitation techniques, is sufficient to protect surface resource and environmental values. This fact has been demonstrated repeatedly by the oil industry in all types of terrain.

A DIVISION OF EXXON CORPORATION

Thank you for your comments. Your views will be given consideration in making the final decision on the Resource Management Plan.

## Comment Letter 27

Mr. Curtis Tucker

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September 14, 1984

If the BLM's preferred alternative is implemented, Category 2 lands (oil and gas leases with special stipulations) will increase by 122% over the present amount. We think that the increase, which will result in 40% of the Book Cliffs Resource Area lands being classified as Category 2, is unrealistically high. Some of these lands should be reclassified as Category 1 (oil and gas leases with standard stipulations). We believe this particularly applies to lands within known geologic structures. We are convinced that standard stipulations are sufficient to protect surface and environmentally sensitive values in the vast majority of the Book Cliffs Resource Area.

We are pleased to concur with the BLM's preliminary recommendation of nonsuitability for the Winter Ridge Wilderness Study Area. We heartily agree with your geologists' interpretation of moderate to high oil and gas potential throughout the wilderness study area. We note also that half of the Winter Ridge WSA is on a known geologic structure. It is our belief that the subsurface resource values in the Winter Ridge WSA outweigh the surface values. Therefore we reiterate our strong recommendation to exclude the Winter Ridge WSA from wilderness withdrawal.

Thank you for the opportunity to comment and your consideration of our views. We look forward to future opportunities to participate in the Bureau of Land Management planning process. Please feel free to contact Mr. Fernando Blackgoat on our staff at 303-789-7488 if, at any time you wish to discuss this area further.

Sincerely,



H. W. Praetorius

FB:mma

c - Mr. W. R. Campbell  
Mr. R. R. Dern  
Mr. P. V. Kemp  
Mr. A. A. Plante  
Mr. H. E. Repp  
Mr. J. A. Willott  
Mr. C. L. Wilmott

## BLM Letter Response



**MOUNTAIN FUEL RESOURCES, INC.**

P.O. BOX 11450 - 79 SOUTH STATE STREET SALT LAKE CITY UTAH 84147

PHONE (801) 530-2400

September 5, 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:

Mountain Fuel Resources, Inc. herewith submits its comments on the Draft Environmental Impact Statement which the BLM prepared for the Book Cliffs Resource Management Area.

In general, the draft EIS is comprehensive and thorough in its coverage of the issues. As a natural gas transmission company, we concur with selection of the Balanced Use Alternative as the preferred management plan. The objectives and actions indicated in Table 2-1 would be compatible with our projected activities in northeastern Utah. The Balanced Use Alternative will enable the development of energy resources while protecting other natural resources.

28.1

The draft EIS indicates that rights-of-way would be encouraged within identified corridors. Unfortunately, this is not always feasible. Studies conducted by local, state, and federal agencies indicate that few corridor opportunities (with limited capacities) are available. Mountain Fuel Resources, therefore, recommends that additional rights-of-way be considered. If adequate mitigating measures are implemented to protect other resources, such additional rights-of-way would not create significant impacts on the Book Cliffs Resource Management Area.

Mountain Fuel Resources appreciates the opportunity to comment on the draft EIS and requests that a copy of the Final Environmental Impact Statement be provided upon completion.

Very truly yours,

*Richard W. Flaim*

*for*  
D. C. Flaim  
Coordinator, Environmental Affairs

DCF:lb

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28.1

The purpose of corridor designation is to channelize future rights-of-way into logical and environmentally acceptable areas to the maximum practical extent. The BLM recognizes some rights-of-way may be needed in areas located outside of any corridor and which cannot possibly be located within a corridor. These types of rights-of-way will continue to be processed on a case-by-case basis.

Refer to page 65 of the DEIS for a discussion of right-of-way corridors.

Comment Letter 29

BLM Letter Response



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII  
1860 LINCOLN STREET  
DENVER, COLORADO 80295

Ref: BPM-EA

SEP 13 1984

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

Re: Draft Book Cliffs Resource  
Management Plan/Environmental  
Impact Statement

Dear Mr. Tucker:

The Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the referenced document. We recognize the difficulty of adequately addressing the resource conditions, management plans, and environmental impacts for such a large area. Our concerns involve primarily water and air quality, and wetland/riparian area considerations in planning the various uses of the Book Cliffs Resource Area Lands. Detailed EPA comments are enclosed.

We feel that the RMP/EIS could provide a stronger management direction to deal with several areas of concern. Some of these actions include: a more definitive correlation with applicable statutes and regulations which deal with water quality; integrating watershed activity planning with the various land uses; expanding the erosion and water quality considerations in DRV management; clarification of nonpoint source water quality impacts and controls; more definitive wetlands/riparian area protection policies; and defining the monitoring program in more detail.

Extensive site-specific project planning and impact analysis will be done under this broad RMP/EIS. We believe that there will be a continuing need for public and other agency involvement in planning some of these projects. The process and opportunity for this involvement need clarification.

Based on our concerns and the criteria EPA has established to rate the adequacy of draft environmental statements, we have rated this draft EIS as Category ER-2. This means that we have environmental reservations about the preferred alternative but additional clarification and impact assessment may alleviate our concerns. If you need further EPA assistance, please feel free to contact Doug Lofstedt of my staff (303-844-2460 or FTS 564-2460).

Sincerely yours,

Jack W. Hoffbuhr  
Acting Assistant Regional Administrator  
for Policy and Management

Enclosure

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CHAP. 5 — PUBLIC REVIEW AND COMMENTS

EPA COMMENTS ON DRAFT BOOK CLIFFS RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT (Utah and Colorado)

Water Quality, Soils, and Watershed

29.1 The current Utah water quality standards, including designated beneficial uses and use protection criteria, should be included as a planning base. Streams meeting or exceeding these standards should be identified. There should be clarification of how BLM's Water Quality Management Program is integrated with the State's Water Quality Management Program.

29.2 We have several concerns which relate to consistency of the RMP/EIS to the Clean Water Act of 1977, as amended. Reference is made on page A4-2 to the Clean Water Act and the Federal Land Policy and Management Act (FLPMA) as granting "authority for . . . a reduction in water . . . quality". Apparently this is in reference to energy development. The exact provisions being referred to should be stated. How are water quality implementation commitments consistent with EPA's current water quality standards regulation which does not allow the state to remove a designated use if, 1) the use is existing (unless a use requiring more stringent criteria is added), or 2) if the designated use can be attained through required technology controls or best management practices (40 CFR Part 131.10(h))? How are the implementation commitments consistent with Section 102(a)(8) of FLPMA which requires that "water resource" values be protected? In summary, the consistency of BLM activities to applicable water quality statutes and regulations needs to be defined throughout the RMP/EIS.

29.3 We commend the BLM for addressing watershed treatment needs and alternative treatment levels. We believe that it is a basic need to implement treatment measures on both the 98,800 acres of land with critical erosion and the 12,300 acres with severe erosion as targeted in the Resource Protection Alternative (versus the reduced acreage of critical erosion lands that would be treated under the Balanced Use Alternative). The planning framework needed to achieve these goals needs clarification. The RMP should list and "prioritize" specific watershed management plans. How will management of the other land use activities (such as grazing, energy development, and ORVs) be consistent and integrated with the watershed treatment plans? There appears to be a weak linkage of managing these other activities to the planned structural work (such as the sediment detention dams) and to overall watershed treatment needs. Soil loss reductions are projected. We believe that the highest feasible reduction should be the goal (as indicated in the Resource Protection Alternative). What improvements in watershed vegetative cover and water quality will result from watershed treatment? We would also like to see any needed watershed inventories scheduled in the RMP.

29.4 Under the Resource Protection Alternative watershed treatment would not be done for areas of "low resource values and a low probability of success" (page 49). We assume this would also apply to the Balanced Use Alternative. What are the criteria for making these determinations? We would like to see the RMP clarify the inter-disciplinary team that will be needed to make these determinations.

29.5

29.1 The BLM intends to be in conformance with all State requirements. The DEIS has been reviewed by the State of Utah. See letter 32.

Willow, Bitter, and Evacuation Creeks regularly exceed Utah standards for boron, an element of concern in irrigation water. The source of the boron is believed to be evaporite deposits in the Green River and Uintah formations. The boron is concentrated as the stream flow is depleted by evapotranspiration. This condition appears to be a natural occurrence and no methods of control are known, hence none are proposed in the RMP.

29.2 The BLM intends to comply with all applicable laws and regulations including those pertaining to water quality. A listing of agencies and appropriate coordination authorities for project approval is provided as Appendix 2. This listing is not totally complete; it shows major authorizing actions. The relationship between other agencies and their legal roles (EPA and Utah) is not pursued. This plan proposes actions which are believed to improve water quality i.e. watershed treatment measures, off-road vehicle designations and development of grazing systems. These actions are consistent with FLPMA.

29.3 Following approval of the Resource Management Plan, the BLM will develop activity plans, including watershed management plans. These plans will address management of specific watershed problem areas. The priorities for developing and implementing these plans will be based upon the comparative severity of the watershed problems, the likelihood of improving the conditions through treatment, and the availability of funding. Coordination of land management with other resource uses would also be included in the activity plan.

29.4 In general terms, any procedures that will reduce sediment will improve water quality. Mechanical treatments, structures, or grazing systems which would improve infiltration or increase vegetation density would be possible methods as suggested in this plan. No data are available which would enable a quantification of the anticipated improvement.

The BLM has completed soil, vegetation, and water point source inventories. Prior to initiating any watershed treatments, the BLM will conduct hydrologic analysis of the proposed treatment areas. Schedules for conducting these inventories will be developed in the activity plans.

29.5 There were two criteria which were used to develop different alternatives that you referenced. The Resource Protection Alternative included all areas of critical and severe erosion and proposed attempting some form of treatment which would be developed in activity planning. The proposed plan (Balanced Use Alternative) delisted areas which have high natural geologic erosion and/or have low annual precipitation and thus would have limited opportunities for successful treatment.

Comment Letter 29

BLM Letter Response

29.6 We believe that it may be appropriate to close severe erosion areas to ORV use as stated in the Resource Protection Alternative (page 49). However, the map showing ORV use designations for the Resource Protection Alternative (page 51) indicates areas closed to travel that do not include all the severe erosion areas shown on Figure 2-6 (page 41). What are the water quality, vegetation, and watershed impacts of limited and open use designations under the Resource Protection and Balanced Use Alternatives? The protection of these resource values should be included in the ORV discussion on page 84. How will ORV management be consistent with the Executive Orders on flood plains and wetlands?

29.7 The RMP/EIS states that the ORV designations under the Balanced Use Alternative would be consistent with plans of the Ute tribe (page xv). What are these plans and in what way would BLM plans be consistent?

29.8 In Utah, the EPA administers the National Pollutant Discharge Elimination System, in consultation with the Utah Department of Health, for point source water discharges. This program should be described under the EPA section of Appendix 4.

29.9 Appendix 4 presents BLM and other agency guidance and/or requirements relating to nonpoint source (NPS) water quality impacts associated with energy development. However, the potential NPS concerns need to be better defined in the alternative comparison and environmental consequences chapters. Briefly defining RMP guidance for controlling potential nonpoint sources should be included. It can be misleading to say, in the case of oil shale on page 200, that if there were no wastewater treatment discharges, there would be no impact to water quality. Are the same assumptions being used for tar sands? Please refer to recent EPA reviews of the Sunnyside Combined Hydrocarbon Lease Conversion EIS and the Utah Combined Hydrocarbon Leasing Regional EIS for a much more detailed discussion of EPA concerns regarding tar sands water quality planning.

29.10 What are the salinity impacts from existing erosion and land use activities (particularly livestock grazing)? What salinity reductions can be achieved through grazing management? The RMP/EIS should target salinity reductions as part of watershed treatment in order to offset salinity increases associated with projected energy development.

Air Quality

29.11 The Utah Department of Health, Bureau of Air Quality would be responsible for issuing any needed air quality permits associated with the projected energy development projects. Several Utah State government agencies are listed on page xi, but this particular agency is excluded. Assurances should be made that they have had the opportunity to review the Draft EIS.

The interdisciplinary team that will determine the specific areas to be treated will be comprised of a hydrologist, soil scientist, range conservationist, and wildlife biologist. Other resource disciplines would review the proposed activity plan during the environmental analysis review.

29.6 See Responses 17.34 and 17.68. Severe and critical erosion areas that are accessible, or likely to receive off-road vehicle, use would be designated as closed under the Resource Protection Alternative and limited under the proposed plan. There would be little difference in the impacts to soil, water, and vegetation regardless of which one is selected. Off-road travel would not be allowed under either choice. The Resource Protection Alternative would require that all roads be designated and signed as open. The proposed plan would limit vehicular use to existing roads without road specific designations and signing of all roads. Specific problem roads or trails could be closed and signed. Specific quantification of the impacts is not possible due to a lack of data; however, some improvement over the Current Management Alternative is expected under both of these alternatives.

Page 84 in the DEIS has been amended to include the protection of water, soil, and vegetation.

An ORV monitoring program will be developed, regardless of the alternative that is selected. Where use problems are identified, modifications will be made to the activity plans and designations may be changed if deemed necessary.

The Green and White River floodplains have been protected under both alternatives and thus comply with the Executive Orders. Other floodplains are commonly covered by vegetation such as greasewood, tamarisk, or big sagebrush which effectively discourages off-road vehicle use. Problem areas would be handled on a case-by-case basis.

29.7 Refer to page 114 of the DEIS for a discussion of consistency with plans of the Ute Tribe.

29.8 See Response 29.2. The BLM consults with the State on water pollution problems.

29.9 See Response 29.1 and page 145, Water Quality Assumptions of the DEIS.

The White River Shale Project, detailed development plan (Bechtel Petroleum, Inc. 1981), indicates that no wastewater will leave the development tract. Since no evidence is available to dispute this assertion, it has been assumed to be valid. This same assumption cannot be made for tar sand development because no specific mining plans have been developed. Water impacts are thus unknown. Specific environmental analyses will be conducted on individual tar sand projects.

29.12 The RMP/EIS states that the National Ambient Air Quality Standards (NAAQS) and PSD Class II increments for total suspended particulates (TSP) would be exceeded under proposed tar sands/oil shale development (pages 82 and 201). The specific projects causing such exceedences would most likely have to control TSP emissions to avoid such exceedences or not be permitted by the State. Actual control requirements by the State need to be in the final EIS. A more fundamental issue is why the BLM is proposing in a preferred action, leasing levels that would exceed TSP standards.

Vegetation Management

29.13 We have several comments and concerns regarding the vegetation management program. We appreciate the fact that such a high percentage of the land in the resource area has vegetation in good to excellent ecological condition. We encourage continued improvement in ecological trend of the fair and poor condition vegetation. We recommend that the EIS assess the watershed/water quality protection value of both the existing vegetation conditions and the ecological conditions supported by the preferred alternative. How does this compare with the protection value of the Resource Protection Alternative? We would like to see the RMP/EIS integrate more clearly the vegetation management goals and programs with the watershed program.

We realize that land treatment may be needed in order to improve substantially forage production in some areas. Treatment such as use of chemicals and burning, is planned under the three non-current management alternatives (page 24 and elsewhere). We are concerned about both the priority and environmental impact of such treatment. It appears to us that the watershed management plans, allotment management plans/planned grazing systems, and implementation of riparian/wetland habitat protection measures are a higher priority to establish before expending funds on vegetation treatment activities. We would like to see the RMP address this issue and clarify these priorities. What are the comparative environmental impacts of this treatment?

29.14 The BLM proposes to have at least a five-year interim monitoring program before implementing changes in grazing practices (page 14). Because of this, the intent to carry out the allotment management direction under the preferred alternative (as expressed in Table 2-1, Appendix 5 and elsewhere) should be defined. Eliminating or restricting spring grazing is an important aspect of grazing management in some cases. Mr. Karl Wright of your staff has clarified that there will actually be 28 allotments in which spring grazing will be addressed through planned grazing systems versus the 15 shown on page 24 for the preferred alternative.

Wetlands and Riparian Area Management

29.15 We commend the recognition on pages 13 and 73 of Executive Orders 11988 and 11990 to protect floodplains and wetlands. However, we suggest several changes and/or revisions in order to develop this program in more detail. The specific RMP criteria used to assure that the executive orders will be achieved need clarification.

29.10 No site specific data are available for estimating the salinity impacts from grazing or other land uses. Studies that were used in development of the Grand RMP described saline soils that originated from Mancos Shale, a type which is generally absent within this resource area.

Approximately 56 percent of this resource area is classified as nonsaline soil, 33 percent slightly saline at depths in excess of 4 inches, major drainages comprise 8 percent which are moderately saline, and 2 percent is highly saline (USDI, Bureau of Reclamation, 1975).

Implementation of watershed treatments, control of off-road vehicle use and development of improved grazing systems will improve water quality through reduction of sediment and salts which would enter live water sources. The amount of salt change resulting from changes in grazing practice cannot be quantified. Salinity reduction would be given a priority in determining which areas would be treated during activity planning. Proper livestock management is probably the best method of controlling salinity.

29.11 Review of the Draft EIS by the Utah Department of Health, Bureau of Air Quality, was coordinated through the State Clearinghouse. The Department of Health has been added to the mailing list per your suggestion.

29.12 Since BLM does not have discretionary authority over the air quality standards, they have only been referred to in this document. BLM is not proposing to violate State or Federal Air Quality Standards. See Response 17.48.

29.13 There are insufficient data to show the impacts by alternative on watershed/water quality from vegetative conditions. If it is assumed there is a relationship between apparent trend and watershed/water quality, then Appendix 14 (Anticipated Trend in Ecological Condition), could be used. This appendix is summarized as follows:

Allotments by Alternative

	Current Management	Resource Protection	Commodity Production	Balanced Use
Upward Trend	6	45	26	28
Downward Trend	7	0	0	0
Stable Trend	33	5	24	17
Stable-Upward Trend	8	4	4	9

It is anticipated that the Resource Protection Alternative would improve ecological condition in fair and poor areas more rapidly than the other alternatives even though the end result may be the same. The monitoring program would provide more complete data on ecological condition and trend.

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The Resource Protection Alternative appears to be more consistent with the orders. This is reinforced by the discussion on pages 23, 24, and under each alternative, which establishes a stronger program of grazing management under this alternative in wetland/riparian areas. We suggest an evaluation of each alternative to the executive orders to assure that as much reasonable protection as possible can be given. We would like to see the existing wetlands mapped and quantified in Chapter 3. The comparative impacts to be allowed under each alternative need further definition.

29.16

Various Nationwide 404 Permit conditions are listed in Appendix 4. What activities will come under this program? Activities requiring individual 404 permits are briefly mentioned under item 17 on page A4-11. The 404 permit program, its location in the CFR, and the activities requiring a separate 404 permit should be defined in more detail. Overall, the role of the Corps of Engineers (COE) in the planning and approval of energy development activities, in particular, that would impact wetlands and perennial streams should be strengthened. In addition, the correlation of BLM planning to COE requirements for these activities should be clarified. Are they integrated?

29.17

Minerals Management

There are several energy development concerns (in addition to those already mentioned) that we would like to raise. It appears that the special stipulations and no surface occupancy designations for oil and gas development under the Resource Protection and Balanced Use Alternatives provide similar water quality protection. We suggest that the EIS address the difference in degree of watershed/water quality protection between these two alternatives. We support the strong approach of recognizing at this level of planning the environmental restraints to future Leasing and Applications for Permits to Drill.

29.18

The discussion of oil and gas on page 60 indicates that areas mapped for each leasing category (page 63) still may be tentative. If there are any revisions planned, what would be the effect on water quality, riparian/wetland areas, or important wildlife areas?

29.19

Additional oil shale leasing could "jeopardize the continued existence of two endangered fish species, the Colorado squawfish and humpback Chub, and another species that is a candidate for listing, the razorback sucker" in the White River (page 199). This is attributed to an annual depletion of 28,000 to 56,000 acre feet of the river. Would the assessment of this impact be coordinated between the U.S. Fish and Wildlife Service and BLM? What impact would this depletion have on water quality standards? Would additional leasing be consistent with the applicable water quality statutes (as already discussed)?

29.20

Under the preferred alternative, substantially fewer acres of the Special Tar Sands Areas (STSAs) would have special mitigation and no surface occupancy requirements. We believe that the RMP should be setting the necessary requirements to protect water quality, riparian/wetland, and watershed values. However, because of these wide differences in leasing category acreages, the adequacy of the planning requirements and the environmental impacts (in addition to acres disturbed) need to be defined.

29.21

Land treatments, water projects and management facilities are part of the development of Allotment Management Plans, grazing systems, Watershed Management Plans, and wetland/riparian habitat protection. The development of the proposed projects would be in conjunction with the development of activity plans. It is standard procedure to give priority to areas in the worst condition. Impacts from these activities are discussed in the short-term long-term sections in Chapter 4.

29.14

Under the preferred alternative, livestock numbers would be limited for the monitoring period. Following monitoring, adjustments in livestock would be made as explained on page 75 of the DEIS. Monitoring during this period would be emphasized. During the five-year monitoring period, emphasis would be placed upon range trend, utilization, actual use, and climatological studies. Implementation of these studies would be given priority over project construction. Project construction would be given priority in I category allotments.

29.15

See Response 29.6.

29.16

Refer to the text revisions on waterfowl in the wildlife sections of Chapters 3 and 4 of the FEIS.

29.17

See Response 29.2. The BLM has and will coordinate review and approval of projects in conformance with the 404 permit program.

29.18

The Balanced Use and Resource Protection Alternatives provide almost identical levels of protection for watershed resources. Although the category designations for floodplains, wetlands, and public reserves shift from two to three, the special stipulations listed in Appendix 4 will provide the same level of protection (see Nos. 3, 4, and 10). The Resource Protection Alternative would provide additional protection to adjacent nonfloodplain and public water reserve areas that do not require it. The Balanced Use Alternative provides for any necessary stipulations to protect watershed resources while not restricting adjacent areas.

29.19

The shaded areas shown for category designations are for illustrative purposes. Although the areas are close to the final designated boundaries, the final 40-acre subdivisions will not be made until after an alternative is selected to be the Resource Management Plan.

The final subdivisions will then be based on resource criteria identified on pages 14, 34, 40, 49, 53, or 60 of the DEIS depending on the alternative selected. For example, if an area has a watershed consideration that requires protection, the area will be stipulated accordingly.

29.20

The BLM will coordinate with the U.S. Fish and Wildlife Service concerning Threatened and Endangered Species. Refer to page 73 of the DEIS. The impacts from cumulative water depletions are discussed on pages 159, 176, 192, and 208 of the DEIS. The proposed plan would affect water quality as described on page 200. Any future water

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29.22 The special stipulations for energy development should be briefly clarified to demonstrate the linkage of mitigation to actual resource protection needs.

Wildlife Management

29.23 The preferred alternative projects a significant effect of energy development and increased livestock production on wildlife (page 199). We question why a significant impact would be necessary. Will the wildlife habitat management plans and grazing allotment management plans be flexible enough to allow for wildlife displaced by energy development activities? We believe that consultation with the Utah Division of Wildlife as these plans are developed, would help assure that displaced wildlife is not significantly affected by crowding, stress, and competition for forage, water, and cover.

Right-Of-Way Corridor Planning

29.24 The impact of right-of-way corridors on critical resources under the preferred alternative needs clarification. Table 2.3 on page 77 states that resource conflicts are possible within proposed corridors. This appears to contradict the statement on page 84 which says that development of the corridors will not be detrimental to critical resources. Can the degree of impact be projected in the RMP? What will be the basic criteria for critical resource protection (in addition to the very broad mitigation listed on page 65)? Will there be opportunities to consolidate uses in order to reduce corridor mileage?

Monitoring

We have several concerns regarding monitoring and evaluation plans. Evidently, a comprehensive monitoring plan including vegetation, soils, watershed, and water quality resources will be done after the final RMP/EIS is completed. We believe that the RMP/EIS development process because of the public and inter-agency involvement, should be used to define these plans to the extent feasible at this level of planning. The following are some monitoring concerns we would like to see addressed:

- 29.25 - water quality monitoring intensity needed to evaluate adequacy of best management practices for controlling nonpoint source pollutants and to demonstrate compliance with State water quality standards,
- consideration of both chemical and biological monitoring,
- water quality monitoring responsibilities of BLM, mineral development lease/holders, and other State and Federal agencies,
- funding sources,
- pre and post-development monitoring requirements,

allocations would be approved by the State. They would determine if the projected impacts are acceptable to them prior to granting the allocation. Coordination with the appropriate Federal agencies would be completed prior to BLM issuing approval of a project. Refer to Appendix 2.

29.21 Refer to Appendix 4 (revised) for a discussion of the category system. Concerns for water quality, etc. can be addressed as special stipulations, while no surface occupancy would effectively deny recovery of tar sands. Further analysis in the RMP is not feasible without specific development proposals. The proposed plan of development by a leasee would require BLM approval and site specific mitigation would be developed at that time. Additional environmental documentation would also be completed prior to approval of the mining plan.

29.22 Refer to Appendix 4 (revised).

29.23 See Responses 12.1 and 12.2.

29.24 The text on page 84 has been revised. Specific impacts cannot be determined without specific proposals. See Response 17.37.

29.25 The purpose of a Resource Management Plan is to allocate resource uses while responding to specific land management issues that are raised by the public. The concerns expressed regarding monitoring are good suggestions and they will be addressed during the specific activity planning for each resource use. Public and interagency review opportunities are provided in that step of planning.

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- corrective actions that could be taken in the various situations that could arise (other than amending or revising the RMP) when problems are identified by monitoring,
- and coordination and approvals of the monitoring and remedial action plans by other relevant agencies including State water quality and wildlife agencies.



United States Department of the Interior  
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Denver, Colorado 80225

IN REPLY REFER TO:

L7619 (RMR-PC)

SEP 18 1984

Memorandum

To: Book Cliffs Resource Management Plan Team Leader, Vernal District Office, Bureau of Land Management, Vernal, Utah

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Environmental Impact Statement (DEIS) on the Book Cliffs Resource Management Plan (DEC 84/30)

The National Park Service (NPS) has reviewed the subject DEIS and offers the following comments:

The current management alternative would result in up to 50 days annually of "atmospheric discoloration" in Dinosaur National Monument (p. 157). In this alternative, class II Total Suspended Particulates (TSP) increment limitations could be exceeded. The class II TSP increment limitations would be exceeded for the commodity production and balanced use alternatives. Only the resource protection alternative would assure compliance with the Prevention of Significant Deterioration (PSD) of air quality increments. Since the Clean Air Act does not authorize exceedances of the class II increments, the resource protection alternative should be the preferred alternative.

- 30.1 Visible discoloration may occur at Dinosaur National Monument and at Colorado National Monument under the commodity production and balanced use alternatives. Although those two alternatives would have more impact than the current management alternative on the monuments, no specific impacts are discussed. There is little discussion of either the Federal class II SO<sub>2</sub> increment or Colorado category I SO<sub>2</sub> increments. The EIS should provide more detailed information on expected pollutant concentrations, increment consumption, amount of visibility degradation and percent of time (e.g., 50 days) the air quality is expected to be degraded at the monuments, as well as the effects of reduced air quality on the biological resources of the monuments. In addition, the air pollution impacts on Arches National Park should be addressed. Subsequent EISs and PSD applications for proposed projects in the Book Cliffs Resource Management Area must provide more detailed information on air quality impacts on Dinosaur and Colorado National Monuments and Arches National Park.
- 30.2
- 30.3 On Page 13, the document states that habitat for the endangered Colorado Squawfish in the Green and White Rivers met the criteria for designation as an Area of Critical Environmental Concern. The document further states that the States of Utah and Colorado are responsible for appropriation of waters

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- 30.1 The BLM concurs that more detailed analyses are needed. Additional air quality analysis would occur when more is known about the actual location of granted leases, where the facilities would be built on those leases, and what technology and related emission control would be proposed. Since these parameters are presently unknown, the RMP analysis is regional in nature and has used what is believed to be a realistic approach to address potentially worst case conditions. The results indicate that air quality could be of concern and further site specific analyses would be done during the NEPA and PSD processes to address specific leasing proposals.
- 30.2 Air quality at Arches National Park would be unaffected by any of the alternatives for this RMP. Each environmental document produced by the BLM addresses air quality impacts, where applicable, based upon the best available data.
- 30.3 BLM agrees with your comment. Refer to page 73 of the DEIS under the title, "Endangered, Threatened, and Sensitive Habitat", and Appendix 2, page A2-2.

from the rivers and that Bureau of Land Management (BLM) does not have the authority to play a major role in the management and protection of these fish species. Although BLM cannot appropriate river waters, BLM should be aware of the habitat and not lease lands in the area for development which would require appropriation of water from the rivers.

As a result of H.R. 1214, the NPS recently prepared a document titled "Resource Assessment for Daniels Canyon Wilderness Study Area." Figure B of this document (attached) depicts a boundary alternative for Dinosaur National Monument that was designed to take into consideration two key concerns. They are:

1. The scenic, scientific, cultural and recreational values that importantly supplement those within the monument boundary, and
2. The management and administration of the area for resource protection and public use.

The Daniels Canyon area and Moonshine Draw area, which are within the alternative boundary referred to in Figure B, contain important scenic and recreation values. These values include:

1. Aesthetic values which constitute the views from:
  - a. Ruple Point Overlook and access trail.
  - b. The Green River which is a popular float trip through a recommended wilderness area, and
  - c. The proposed trail through Daniels Canyon as discussed in the draft General Management/Land Protection Plan (GMP/LPP) for Dinosaur National Monument which is soon to be released for public review.
2. Opportunities to develop hiking trails between key points of development (i.e., Josie Morris Ranch and Echo Park).
3. Opportunities to interpret the historic Outlaw Trail and other cultural and natural values.

The GMP/LPP will recommend that these lands be protected through the withdrawal process and that a memorandum of agreement be prepared to insure that the opportunities and values as mentioned above are properly considered and provided for.

30.4 In view of the above, we recommend that the EIS for the Book Cliffs Resource Management Plan be revised to reflect that the following stipulations would be enforced upon the red cross-hatched area on the attached land ownership map (Figure 1-2):

1. Withdraw the area under the provisions of FLPMA as being subject to the Mining Law of 1872.
2. Designate as "No surface occupancy" (refer to Figure 2-23 in the DEIS).

30.4 BLM believes that area contiguous to Dinosaur National Monument in the Daniels Canyon and Moonshine Draw vicinity would be adequately protected through implementation of the RMP. The Proposed Plan would limit ORV use in the area along the stockdrive trail above the Josie Morris Cabin and place Daniels Canyon and portions of Doc's Valley in oil and gas leasing category II, where special stipulations will be attached to protect the surface. This visual resource management class could be adjusted upward if any changes occur in one or more of the variables used to determine the visual management class, i.e. user sensitivity. Possible mineral developments could be adequately controlled under the 43 CFR 3809 regulations.

3. Designate as "Class I change not permitted" on the "Visual Resource Management Classes" map (refer to figure 3-17 in the DEIS).

4. Designate "Closed to Travel" on the "Off-Road Vehicle Designation" map (refer to figure 2-28 in the DEIS).

The NPS continues to express an interest in taking advantage of memorandums of agreement where practical to properly address resource and recreation needs as well as management and administrative concerns. As each agency continues developing its management plans we encourage and look forward to the opportunity to resolve all issues and concerns regardless of what vehicle we might utilize.

30.5 We would also like to urge that the BLM planning consider preserving the viewshed from the Colorado National Monument looking across the Grand Valley towards the Book Cliffs.

30.6 The DEIS omitted reference to three potential National Natural Landmarks located within the Book Cliffs Resource Area. All three sites are located in Uinta County, Utah. They are:

- 1. Blue Mountain - Cliff Ridge
- 2. Bonanza Gilsonite - The Cowboy Vein
- 3. White River Fossil Plants

Further planning for the Book Cliffs Resource Area should take into account these potential designations and avoid impacts that could adversely affect the outstanding ecological and geological features of these areas. Information on the National Natural Landmark program can be obtained from Carol Madison at the above address, telephone 234-6443.

Richard A. Strait

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30.5 No significant impacts to the Grand Valley viewshed would occur under the Balanced Use Alternative.

30.6 The Blue Mountain - Cliff Ridge vicinity was identified as being significant and is proposed to be protected by a scenic corridor to be established between U.S. Highway 40 and Blue Mountain. Within the corridor, ORV use and oil and gas leasing would be restricted and the visual resources protected. The Bonanza Gilsonite Site (the Cowboy Vein) and the White River Fossil Plant Area are located on private land.

The National Park Service is charged with the National Natural Landmark Program and they determine which areas merit study and qualify for designation (CFR 36, Part 62). If the National Park Service determines Cliff Ridge is suitable for landmark status, the Book Cliffs Resource Management Plan can be amended.



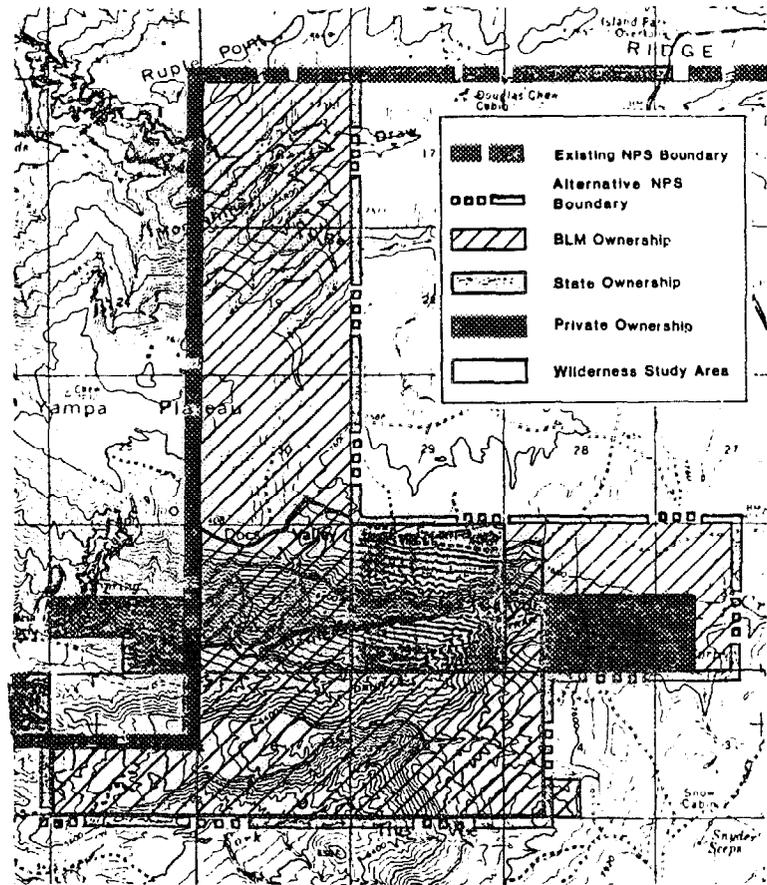


Figure B. Boundary Alternatives