

William John Kremin, III  
614 East 2970 South  
Vernal, Utah 84078

March 3, 1992

Fenelope Stalley  
Bureau of Land Management  
170 south 500 East  
Vernal, Utah 84078

RE: Diamond Mountain Resource Management Plan

Re. Stalley.

I am concerned that some of your proposals for Diamond Mountain would adversely affect the Jackson Draw area. While most of the meadowland is privately owned, I have found that the owners are most co-operative if asked about access for hiking, horse riding, and even hunting. In a time when such effort is put into preserving areas, as much as is possible, in the natural state, I find it a quandry that opening up the area is proposed. While opposed to closing areas to most people by wilderness designation, I also feel that a cautious approach must be taken when opening up lands that are prime habitat for Elk, Deer, Moose, Bear, and many small game as well.

Land access is now available with permission. An increase in vehicular traffic would just continue to erode the now dwindling wildlife habitat, and force much of that wildlife out of the area. Thanking you for your time and consideration of my thoughts.

*William John Kremin*  
William John Kremin, III

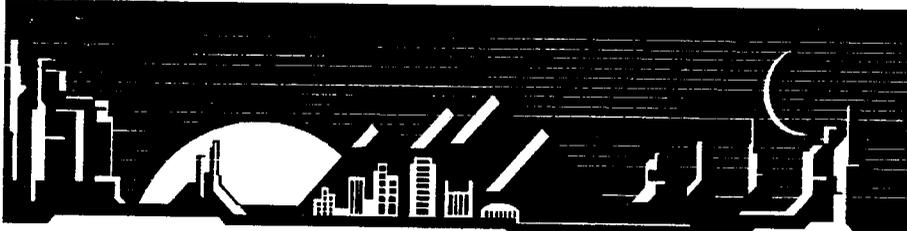
RESPONSE TO COMMENT LETTER 73 (KREMIN)

73-1  
1.

We appreciate your concern. Please refer to our response 12-

73-1

5.81



UTAH CHAPTER SIERRA CLUB  
177 EAST 900 SOUTH, SUITE #102  
SALT LAKE CITY, UTAH 84111  
(801) 363-9621

March 23, 1992

FOUNDED IN 1962 BY CITIZENS OF UTAH

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

Utah Group Chairs  
Clyde F. Gillette 1962-1964  
Glenn E. Casey 1965  
William Vincent 1966  
Fred Montmonney 1967-1968  
Jane Viewort 1969

Utah Chapter Chairs  
Jane Viewort 1969-1970  
Paul Solisbury 1971-1972  
Ruth A. Foner 1972-1974  
Dad Wilens 1975-1976  
Irek McClendon 1977-1978  
Paul Solisbury 1979  
Brian B. Beard 1980-1981  
Alan Miller 1982-1984  
Joan Bryson 1984-1985  
Gabe M. Smith 1986-1990  
Ed Blankman 1991

Dear Ms. Smalley:

The Utah Chapter Sierra Club supports Alternative B (Ecological Systems) as the alternative with the most environmentally sound minimum management guidelines for the Diamond Mountain Resource Area.

While we understand that Alternative E was selected because it provided the best "mix" of management objectives from the numerous perspectives of interested parties, we still believe that a predominantly ecological approach is necessary at this time. For many years, development and commercial endeavors have taken precedence over preservation and protection of natural resources. We believe that the management objectives in Alternative B are a good first step towards remedying the environmental abuses of the past.

We believe that some of the guidelines in Alternative B do not go far enough. We have found little evidence to support the continued use of vegetative treatments and range improvement projects to increase AUMs or change the vegetative components of particular areas.

We believe that a greater portion of the Resource Area should be closed to OHV use. We recommend that a full EIS on the effects of oil and gas development in the Resource Area be completed prior to lease issuance under these proposed surface use guidelines. We believe that mineral withdrawal and NSO stipulations should be implemented throughout ACECs to more adequately protect their resources. Acquiring funds for monitoring programs to ensure compliance with all aspects of the RMP should be a high priority.

We urge you to reconsider your recommendation of Alternative E as the Preferred Alternative. We believe that Alternative B (or an even stronger ecosystem-oriented version) would provide the Resource Area with

RESPONSE TO COMMENT LETTER 74 (UTAH CHAPTER SIERRA CLUB, Osborn)

74-1 Thank you for your comment.

74-2 Please refer to the vegetation resources section under "Management Common to the Proposed Plan and Alternatives" in Chapter 2, dealing with vegetation treatment methods. By reference we are including BLM's Vegetation Treatment EIS and Record of Decision (1991) in this document.

74-3 Lands in the resource area were designated "open", "limited", or "closed" to OHV use based on resource values needing protection. Lands were closed to OHV use only if resource specialists believed it was necessary to protect a specific resource value.

74-4 The RMP/EIS satisfies the NEPA requirements for issuing fluid mineral leases.

74-5 Approximately 40 percent of the lands within the proposed ACECs would be recommended for withdrawal or categorized as NSO; these correspond to the level 1 and 2 lands for these ACECs. The remaining lands within the ACECs would be managed in a manner so as not to adversely effect or compromise the important resource values that justified the ACEC designation.

582



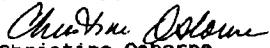
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Chapter 5 - Coordination and Consultation

the optimal management objectives and ensure the healthy perpetuation of its numerous natural resources.

Thank you for the opportunity to comment on the proposed RMP. We are pleased to see the inclusion of an ecosystem-intensive alternative, and again request that the BLM consider that as the Preferred Alternative. Please send me a copy of the Final RMP upon its completion.

Sincerely,

  
Christine Osborne  
Public Lands Specialist  
1536 East 3080 South  
Salt Lake City, Utah 84106

116 Candlerwyck Dr W  
Tacoma WA 98467  
March 17, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management  
Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production with  
limitations.

Dear Ms Smalley,

As part owner of the Mame's Hole-Bear Hollow area I am totally  
opposed to any development or burning in this area.

Having spent many hours and days in that beautiful mountain  
Jackson Draw I feel that the DMRA plans, especially in  
Alternative A and E, are not the best long term interest and use  
of that area of Diamond Mountain. The long term emphasis should  
be the production of food and forage. There will NOT be a Post-  
Agriculture Society. Your evaluation of the livestock men  
dismisses the need for the continued production of food and fiber  
in the coming years. The world's food supply continues to  
diminish.

Mame's Hole - Bear Hollow are still remote pristine area with  
"Old Growth" forests of conifers, Quaking Aspens and Sege  
Lillies. As you travel up the face of Taylor Mountain, Brush  
Creek Mountain the sight of the forest devastated by the damage  
of the Pine Bark Beetle and the cutting of wood and the roads  
that cut across forest and mountain meadows is a tragedy that  
never should have happened to our natural environment. It will  
take centuries to restore, if that is even possible. Why add to  
this decimation and destruction of our natural resources?

In Alternative A and E you are suggesting the accessing of Mame's  
Hole - Bear Hollow with a road. Such a road would destroy the  
meadows in the bottom of the draw, cut through rocky mountains  
sides of sego lillies, quaken aspen and conifers that have been  
left untouched through the years. There has not been an  
accessible road into this high mountain area. An access road

## RESPONSE TO COMMENT LETTER 75 (ELY)

75-1 Thank you for expressing your concerns. Please refer to our  
response 12-1.

5.84

75-1

75-1  
Cont.

would cause soil erosion and destroy the beauty and remoteness of Jackson Draw . These areas can be viewed from the county road that passes in the bottom of the Jackson Draw. A road into Mame's Hole - Bear Hollow would also disturb the wildlife that use those sites for home, protection and shelter. Their habitat will be drastically changed forever.

The need for access is outweighed by the preservation of the few remaining remote meadows available for wildlife and animals. These remote, yet viewable areas, are better preserved for future generations who desire to travel along a Scenic By Way in the bottom of the draw and not see the mountain sides carved up with roads from the top of the mountains to the bottom. "Cousteau Watch" in the March 22, 1992 edition of the Morning New Tribune said, "In days ahead, natural resources may be worth more in an untouched state than when developed. They may generate more money over the long term merely by existing, like savings held in a bank, than by being exploited".

Mame's Hole - Bear Hollow and Jackson Draw SHOULD NOT be exploited by building roads into them!!!

585

75-2

The increased amounts of Wildlife proposed for Mame's Hole- Bear Hollow will infringe on the private land owners in Jackson Draw. I have counted larger herds of deer and elk seen there than you have listed on Table A2-1. Our private lands are closed to public deer hunters and will remain so over the coming years. Public deer and elk hunters do not make for good neighbors because of the damage they inflict on the property of the private land owners.

75-3

The building of a campsite in Bear Hollow is opposed. Unless the BLM is going patrol the area to keep the public from trespassing and desecrating the private land surrounding it. A public camp ground is available within three to five miles at the Warren Draw Reservoir (Calder's Pond).

75-4

The DMRA plan does not clearly designate those structures and properties which are privately owned and those that are public in the maps and table. An example is the grazing allotment map. A glossary of the abbreviated terms used in the charts and tables is needed. It is difficult to determine what they mean and their future use. Example A8.33 What does Res. mean? If it means Reservoirs, where are you going to build such structures? On the tops of the hills? Are those to be built on private or public lands?

75-5

BLM proposes the burning of 200 acres in Mame's Hole - Bear Hollow. We are opposed to burning of the land without knowing specifically where the burning is to take place. The last burn in that area escaped the burn area and burned the whole mountain side when the winds suddenly changed.

75-2

Please refer to our response 12-2.

75-3

Please refer to our response 53-1.

75-4

The abbreviation "Res." means reservoir, a description of the abbreviations has been added to Table A8-4 for readers' convenience. All range improvements are proposed to be built on public lands. Project work numbers are estimates. Exact locations would be designated at the activity plan level and are subject to NEPA review. Refer to Chapter 2, vegetation resources discussed in "Management Common to the Proposed Plan and Alternatives".

75-5

Please refer to our response 68-2.

It is unfortunate that the cost of the EIS and the projected tax dollars required for each Alternative is not also required with the Environmental Statements, so the tax payers would have an idea of what each project is going to cost and how they are to be funded.

Again, we are opposed to any development and increase in wildlife in the Mame's Hole - Bear Hollow, Jackson Draw areas.

Sincerely yours,

*Sandra H. Ely*  
Sandra H. Ely

227 South 500 West  
March 24, 1992

Attention Jean Sinclair  
Vernal BLM District  
170 South 500 East  
Vernal, Utah 84078

I wish to support Alternative E in regards to the Diamond Mountain Resource Management Plan. I believe there are many important ways we can and should use our public lands and resources. Document E gives us a well rounded emphasis which is beneficial to many instead of just a few, as the other Alternatives do (A, B, C & D).

I oppose any more land designated for phosphate mining in the Red Mountain - Ashley Creek area. I would rather see more Level 1 and Level 2 management prescriptions, which would include protective zones around sensitive archaeological and paleontological sites.

I appreciate the BLM for its emphasis on once-common indigenous species, such as the bighorn sheep and black-footed ferret. I urge maximum protection for these and other endangered species on BLM lands.

I appreciate all you do.

Sincerely,

Tim Hadlock

RESPONSE TO COMMENT LETTER 76 (HADLOCK)

76-1 Please refer to our response 61-2.

76-2 Please refer to our response 61-1.

5.87

76-1

76-2

March 24, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Ut. 84078

Dear Ms. Smalley,

I am writing to comment on the Diamond Mountain Resource Management Plan. First of all I would like to express my support for alternative "E". It is the most balanced alternative. The others heavily favor one faction or another to the detriment of the whole.

While I support alternative "E" I still feel that there are some changes which would improve it. I believe that more acreage should be added to the level 1 and level 2 management plans. More non-commercial resources should be given protection. Many of the archaeological, riparian and scenic areas in this plan are priceless and irreplaceable. Sensitive zones could be established around such areas to prevent sites from being disturbed. I also think it would be a good idea if more surveys were made so we could be sure we know of all the special areas that need protection. Motorized access should be restricted where it has the potential to damage fragile resources. There must be a way to enforce restrictions as well, it does no good to say you are going to protect an area if you don't back it up with action.

I would like to see more adequate protection for the slickrock areas north of Steinkner. I have spent many afternoons hiking near Moonshine arch and it is clear that the area is not being managed effectively. The graffiti and trash are deplorable. This area should be closed to motorized vehicles. Private or State owned land could be acquired to create a buffer zone around the area.

Phosphate mining in the Red Mountain area is a terrible idea. I have spent quality time hiking and horseback riding there and it is too special and beautiful to tear up. This area is also critical elk and deer winter range. There was a huge public outcry when phosphate prospecting permits were applied for several years ago. The people of the Basin do not want a strip mine in this area. We already have one huge phosphate mine in that general vicinity. There has been enough land sacrificed to phosphate already! I was told in 1986 by Mr. Hadenham, former manager of the Chevron Phosphate operations, that they then had access to enough phosphate to keep them busy for 300 years. Enough is enough! I don't think they have done such a great

RESPONSE TO COMMENT LETTER 77 (DURRANT)

- 77-1            Please refer to our response 61-1.
- 77-2            Please refer to our response 70-1.
- 77-3            Please refer to our response 61-2.

5.88

77-1

77-2

77-3

77-3  
Cont. job of restoration either. I would also like to see motorized vehicles restricted to the existing Jeep trail on Red Mountain.

77-4 I think the reintroduction of animals once indigenous to the Diamond Mountain Resource Area is a great idea. We've spent several days observing some of the big horn sheep which have already been reintroduced to N.E. Utah. I look forward to further big horn sheep placements and to your planned reintroduction of the black-footed ferret. I support your proposal to eliminate bear baiting on BLM lands. I would also like to encourage you to give all protection possible to any animal species which are threatened or endangered in this management area. Every effort must be made to protect nesting sites and instream flows on a year round basis.

77-5 I would like to urge you to place the lands in Diamond Breaks and West Cold Springs Wilderness Study Areas in the Brown's Park Complex Area of Critical Environmental Concern in the event that they not be given Wilderness designation. This will at least afford them some protection.

77-6 Finally, I would like to express my support for Wild and Scenic status for the Upper and Lower Green River. This is a special and unique river. Thousands of people, including myself, take great pleasure from their experiences there. It is essential that this magnificent resource be protected.

Thank you for your time and for your attention to my comments.

Sincerely,



Brenda Durant  
3264 West 500 South  
Vernal, UT. 84078

77-4 We appreciate your support for wildlife reintroductions. Please refer to our response 70-3 concerning bear baiting. We also appreciate your concerns and support for the special status animal species program. BLM Vernal District's water depletion plans for the endangered fish species in the Green River is currently being developed. This policy when finalized should help to maintain or improve instream flows and would apply to any resource management plan. The proposed plan, as in Alternative E, would also protect listed animal species' nesting sites as well as the special status raptor species, golden eagle and ferruginous hawk, nest sites on an annual basis.

77-5 For clarification, should the Diamond Breaks and/or West Cold Springs WSAs not be designated as wilderness areas, under the proposed plan these areas would be included in the Browns Park ACEC Complex and managed to meet the prescriptions for semi-primitive, nonmotorized areas.

77-6 Thank you for your support of the recommendation for designation of the Upper Green River as a wild and scenic river.

3-23-92

BLM,  
Jurnal District,

To Whom it may concern:

I resent the segments that  
you have identified in the Green  
River, Five Mile Creek and Angyle  
Creek as suitable for study for  
inclusion in the Wild and Scenic  
River System -

Please, get real!

Get the land and the BLM  
be for the people!

Randia Cox  
P.O. 573  
Orangeville, Mt. 84533

RESPONSE TO COMMENT LETTER 78 (COX)

78-1 Please refer to Appendix 7 for the analysis of stream and river suitability under wild and scenic river criteria.

Lorin E. Squires  
2795 West 1100 North  
Vernal, Utah 84078

March 26, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Ut 84078

Dear Ms. Smalley:

I am writing in reference to the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement. I have a copy of the management plan which I have studied. In addition I have participated in meetings of the natural resource committee of the Uintah Mountain Club and have contributed to the analysis of the plan performed by that organization. You will receive a letter presenting our support for alternative E of the plan with certain recommendations for modification. I wish to underscore the information in the Uintah Mountain Club document. I also wish to lend my support for the preferred alternative which I consider to be a good balanced plan for management of the resource area, and I hope that there will not be an erosion of this balanced management approach.

I encourage a management approach which provides for sustained utilization of the land while preserving its ecological integrity rather than a more consumptive attitude which usually is accompanied by environmental deterioration. I feel that the recommendations presented in the Uintah Mountain Club statement support this theme. I would like to focus on a few areas of concern.

79-1 The acreage listed for level one management priority under alternative E should be expanded. Additional acreage for upgrade to level 2 management should also be considered. One area that I would like to see have more restricted management is the sandstone formation region north of Steinaker Reservoir. Please consider a management emphasis of this area which will prevent environmental degradation and preserve aesthetic quality.

79-2 I would like to underscore the designation of the plan's Areas of Critical Concern (ACEC) including designation of portions of the Green River under the Wild and Scenic River Act. I also support careful management of riparian habitats including management for mitigation of environmental degradation and also for reclamation of previously damaged habitat.

79-3

79-4 I anticipate that the use of public land by off-highway vehicle operators will increase. This will be both a function of increased population, tourist use of our area and greater recreation activity. While many vehicle operators show wisdom and respect for other people and the land, an element in this group focuses only on the thrill of the ride regardless of the

## RESPONSE TO COMMENT LETTER 79 (SQUIRES)

79-1 Please refer to our response 61-1.

79-2 OHV restrictions identified for the sandstone area of Red Mountain are somewhat more restrictive in the proposed plan than they were in the draft. As stated in the proposed plan, a recreation management plan will be prepared to identify in detail how the area will be managed. This plan will address the needs of OHV users, mountain bike users, horseback riders, and individuals enjoying hiking in the area. Some give and take will be required by all parties involved to accommodate the needs of others. Any plan must include the cooperation of, and be sensitive to, the desires of private landowners in the area. Please refer to Table 2-16 for decisions for special emphasis areas under the proposed plan.

79-3 Thank you for your support for the proposed ACECs and recommendations for inclusions in the National Wild and Scenic River System.

79-4 Please refer to our responses 74-3 and 79-2.

79-4  
Cont.

impact of the surroundings. Some individuals also abuse their right to use our road and highway system, and for this reason we have laws and regulations to govern vehicle use. I urge the district managers to develop a plan for the management of OHV's on BLM land and include in that plan restricted use of these vehicles in areas with sensitive vegetation, cryptogamic crusts and easily erodible soils. The slickrock region on the slope of Red Mountain should be included in the restricted zone. Attention should also be given to the concerns of hikers and other non-vehicle recreationists who often feel that noise and interference by OHV activity degrades their recreational experience. I enjoy the use of off-highway vehicles but have been appalled by the environmental damage I have witnessed in this and other parts of the state and would hope that such damage can be mitigated.

79-5

I am personally opposed to phosphate mining in the Red Mountain to Ashley Creek area and would support an addition to the plan restricting mining activity in this area. I reiterate my support for the preferred alternative, alternative E, and hope that the district will resist efforts to alter this alternative in preference to alternatives A, C or D. I also strongly encourage careful consideration toward incorporating the Uintah Mountain Club's recommendations into the preferred alternative.

I commend BLM personnel for the efforts that have gone into the preparation of this plan and hope that effort and resources for implementation will be forthcoming. Thank you for your consideration of my comments.

Sincerely,

Lorin E. Squires

79-5

Please refer to our response 61-2.



*DRAA Comment Letter Continued*

- 80-6  
Cont. *action. The development of habitat for the sheep will require burning. We fear the impact of the reintroduction to our present way of life by the closure of roads, hunting and grazing by livestock. The plan cites restrictions of one mile and ten miles. Placing sheep in this area of the quantities stated will attract more tourists, environmentalists and photographers yet there are no plans mentioned for facilities such as restrooms and new roads. The time to budget all costs is now, not at a later date.*
- 80-7 *7. Jarvie historic Site: We would like to see preservation of the heritage of Esther Campbell at the Jarvie site. The rock garden in particular as that is all that is left. This was history in the making and should be retained. Many of the trees and shrubs have been destroyed by beavers and fires. The many seedling of trees on the property could be transplanted. The sidewalks placed for the physically challenged detracts from the historical theme. Utilization of golf carts to service the people would have been a viable alternative.*
- 80-8 *8. Tourism: BLM and DWR should share in the costs to maintain and improve the roads (i.e. paving). Costs should be included in your budgets. Special consideration for widening the dugway from the Taylor Flat Bridge to 1/3 mile to the east should be included in the plan. When traveling the roadway, the scenery is beautiful and could be a distraction to a driver. The roadway is narrow and has blind spots to oncoming traffic. The widening of the roadway would not be visible from the river level as the road is several feet above it.*
- 80-9 *9. Sanitation Facilities and Landfill Area: With the increase of tourism the one garbage trailer on Bridge Hollow is not sufficient. Establishing a landfill area would encourage proper disposal of garbage. Placing restrooms facilities at 2-3 mile intervals from Bridgeport to Swallow canyon would reduce human waste along the river.*
- 80-10 *10. Riparian Areas: These areas along the river seem to sustain the activity of persons and the livestock grazing on the Jarvie Site. Increased flows from the dam would have a more devastating effect in the event of heavy spring runoff.*
- 80-11 *11. Red Creek Drainage: This area should be a high priority. Coordination with Wyoming BLM should be initiated to prevent the flow of silt into the Green River. Construction of catch basins should be implemented immediately.*
- 80-12 *12. Wild and Scenic River Designation: We feel this designation will have an adverse affect on the private landowners and citizens in Browns Park. The economy of Daggett County could be impacted. The present tax base is at 8%. The Federal and State agencies have more than enough control over the river and*

Historic Site to meet some of these needs. These facilities will have adequate restrooms and roads to meet the future public needs.

80-7 The Jarvie property was acquired by BLM to preserve and interpret the history of John Jarvie between 1880 and 1909. Although there may be a value in preserving the heritage of Esther Campbell, we do not feel that it should be done at the Jarvie Historic Site. The sidewalks were installed at the historic site after consultation with the State Historic Preservation Officer. They are intended to make it more accessible to the physically challenged. Various other alternatives were examined, but none were found to be satisfactory.

80-8 The road of concern is a county road. Daggett County is responsible for maintenance and safety problems along its route.

80-9 If more than one garbage trailer is needed at Bridge Hollow, another one will be provided. Establishing a landfill area in Browns Park would be much more expensive at this time than hauling garbage to Dutch John or Vernal. We agree that additional restroom facilities are needed in Browns Park along the Green River. These will be provided over time as funding permits.

80-10 Livestock grazing on the Green River in Browns Park under the proposed plan would be open to restricted grazing on a case-by-case basis only as a biological tool to control noxious weeds or to maintain or enhance wildlife habitat (refer to the ACEC prescriptions for livestock in the proposed plan). Periodic flooding during heavy spring runoffs has the potential to expand or improve riparian areas.

80-11 The majority of the watershed for Red Creek is in Wyoming. Wyoming BLM is currently planning watershed improvement projects as part of the Green River RMP which is also currently in development. BLM in Utah has built 115 reservoirs as part of the existing Red Creek Watershed Plan. We have added these reservoir numbers to Table A8-1 under the Clay Basin Allotment. BLM proposes to build 15 more reservoirs under the proposed plan. See Table A8-4, Clay Basin Allotment.

80-12 Please refer to our response 36-1. Toliver Creek was on a list of streams looked at for possible wild and scenic river designation, but it was determined that it did not meet the criteria for further study. It is proposed to be dropped from further study.

DRMA Comment Letter Continued

80-12  
Cont.

and lands in this area.

The citizens of Daggett County would like to take the initiative to develop tourism consistent with the history of the ranches, sports and outdoors persons way of life. The list of rivers and streams includes Toliver Creek which runs thru our property. We question the inclusion as the only time there is water is during spring runoff. Buffer zones on either side of this creek would affect our lands. We oppose this inclusion.

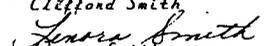
We are sure there are more areas of concern we should have addressed. Some of the statistical data seemed questionable, however not enough time was available to verify.

We do not want our quality of life to be impacted unfavorably. We have family that share our love of the area and we intend to leave our land and home and culture that we have built for the past 18 years to our children and their future.

We would like to be able to continue to care for the area and take our part in protecting the existing beauty without further restrictions.

We wish to be included in the remaining phases of this plan.

Respectfully submitted,

  
Clifford Smith  
  
Lenora Smith



United States Department of the Interior

NATIONAL PARK SERVICE

ROCKY MOUNTAIN REGIONAL OFFICE

12795 W. Alameda Parkway

P.O. Box 25287

Denver, Colorado 80225-0287



IN REPLY REFER TO:

L7619 (RMR-PP)

MAR 25 1992

Memorandum

To: Team Leader, Diamond Mountain Resource Management  
Plan/Environmental Impact Statement, Bureau of Land Management,  
Vernal, Utah

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

Subject: Diamond Mountain Resource Area Draft Resource Management Plan and  
Environmental Impact Statement (DES 91/0034)

The National Park Service (NPS) has reviewed the above-referenced document and offers the following comments.

Management of Bureau of Land Management (BLM) lands is of concern to the National Park Service (NPS) because actions taken on these lands may impact units of the National Park System or other areas where the NPS has program responsibilities. One unit, Dinosaur National Monument, as well as several National Natural Landmarks, could be impacted by activities proposed in this document.

Based on our NPS responsibility to protect monument resources and resource values, we recommend adoption of Alternative E (preferred alternative) with modifications based on our recommendations in this response. Without those modifications, we recommend adoption of Alternative B (ecological systems).

The proposed action generally classifies areas adjacent to Dinosaur National Monument as Management Levels 3 and 4. In Alternative B, those same lands are generally classified in Management Level 2.

The document indicates that lands adjacent to Dinosaur National Monument include high sensitivity paleontological zones, relatively low mineral potential, high values for a variety of wildlife, critical watersheds, and 100-year floodplains. The lands inside the monument also have high public values for wildlife, paleontological resources, public enjoyment and recreation, watershed, and solitude. Adoption of Alternative E with designation of lands adjacent to the monument in Management Levels 3 and 4 would not adequately protect monument resources and park values.

RESPONSE TO COMMENT LETTER 82 (NATIONAL PARK SERVICE, Snyder)

82-1 BLM specialists independently portrayed resource values, restrictions and management levels they determined were needed to protect resource values on public lands. This analysis resulted in lands adjacent to Dinosaur National Monument being placed in management levels 2, 3, and 4. We feel these management levels are adequate to protect resources without compromising the resource values within the monument. Adjoining landowners would be consulted prior to initiating any actions that may affect them.

5 96

82-1

82-1  
Cont.

Alternative E would likewise not adequately address similar values on contiguous public lands covered under this draft plan. Of particular concern is one block of land immediately contiguous with park lands that is recommended as Management Level 4 (open management). We suggest that open management is an inappropriate designation for any public lands adjacent to Dinosaur National Monument.

Given BLM's affirmative obligation to consider and aid in the protection of park resources and resource values, Alternative B more closely fits as the preferred alternative on lands immediately adjacent to Dinosaur National Monument. A modified Alternative E (preferred alternative) that would enhance protection for adjacent lands by redesignating those lands from Management Levels 3 and 4 to Management Level 2 would be an acceptable alternative.

We appreciate the opportunity to review this document. Our general comments are enclosed.



Michael D. Snyder

Enclosures

NATIONAL PARK SERVICE COMMENTS ON DIAMOND MOUNTAIN RESOURCE AREA DRAFT  
RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Mineral Resources

Our comments address only those areas in which oil and gas operations could impact the resources of Dinosaur National Monument and are directed toward inconsistencies within (a) the mineral potential classification, and (b) the management alternatives.

82-2 We have difficulty reconciling the regional geology of the "Horseshoe Bend-Ashley Valley Region (HB-AV)" surrounding the park with the "moderate" hydrocarbon potential and the oil and gas play type assigned to it (depicted on Maps 3-12 and A4-1, respectively). Examination of the geology indicates the dominant feature here is an upthrown block, bounded on the north by the Island Park fault and on the south by the Wolf Creek fault, and cored by exposed Mississippian age rocks along its axis. This area is topographically expressed as Split Mountain. The north flank of this block, situated on the moderate potential land, is the overturned southeast limb of a syncline, exposing Pennsylvanian through Jurassic age rocks on the hanging wall block, and Jurassic through Cretaceous age rocks on the foot wall block. The axis of the syncline is overturned beneath the Island Park fault, and the northeast limb climbs gently to the northwest where it crops out in the Diamond Mountains. One of the three producing formations in the HB-AV region, the Pennsylvanian Weber, is breached all along the north flank and on the westward plunging nose, enhancing the probability of reservoir flushing. Both regional structure and surface exposures suggest this is an unlikely area for hydrocarbon accumulation.

Examining the well information in the area surrounding the monument further supports our contention that the area would be more appropriately categorized as "low potential." There were only three wells drilled adjacent to the monument. The Hiko Bell Jensen well number 1 was drilled in Township 3 South, Range 23 East, Section 28 to a total depth of 6,208 feet to the Weber formation. Only a very light cut of crude was found with the drill mud. The well was subsequently plugged and abandoned. The Union Texas Rammison 7-1, Township 4 South, Range 23 East, Section 7, was drilled in August of 1980 to a total depth of 8,285 feet. The drill stem test indicated no presence of hydrocarbons, and recovered fresh water at 8,000 feet. As with the Hiko Bell well, this well was plugged and abandoned. The final well was located in Township 4 South, Range 23 East, Section 34. The target formation was the Weber at 5,552 feet. There was a weak blow of gas at 2,890 feet that died in 5 minutes. Again, this well was plugged and abandoned. In fact, there is no production anywhere between the two areas of outcrop mentioned above. The fields discussed in the HB-AV region are all located west of the monument, closer to Vernal.

Two other zones (Tertiary Green River and Uinta Formations) are described in the document as having hydrocarbon potential in the HB-AV area. Examination of the surface geology in the area immediately adjacent to the park indicates the Tertiary section was either denuded or never deposited anywhere between the park and the Diamond Mountains. We dispute the inclusion of this area in the "Tertiary Shallow Undiscovered Oil Play" when these rocks are not present.

82-2 Moderate and low mineral potential lands are defined in the Glossary (please refer to page G.8 "Mineral Potential"). Published subsurface maps indicate that the subsurface geologic environment is favorable north of the Dinosaur National Monument boundary. Both the Hiko Bell Jensen No. 1 exploratory well and an additional Hiko Bell well (Township 4 South, Range 23 East, section 34) indicate that both wells had shows of either oil or gas. Therefore, based on the definitions of mineral potential in this document, it seems appropriate not to change the designation of the potential of the lands north of the Dinosaur National Monument boundary.

We agree with your comment that Tertiary strata is not present at the surface surrounding Dinosaur National Monument (please refer to Map 3-11). Therefore, we agree that draft Map A4-1 which displays "Tertiary Shallow Discovered Oil Plays" as present adjacent and within the Monument is in error. Please refer to final Map A4-1 to note the correction.

While the Horseshoe Bend-Ashley Valley Region is undoubtedly hydrocarbon rich, we question the inclusion of the area surrounding the nose and flank of the uplift. Both surface and subsurface information available indicate that this is a poor area for oil and gas production and should be categorized as having "low potential." By doing so, either careful or restricted minerals management guidelines could be imposed in the area surrounding the park with minimal adverse effect on the oil industry.

Visual Resources

82-3 The document shows Visual Resource Management (VRM) classes in Map 3-33 (page 3.71) within the Resource Area. Nearly all of the lands adjacent to the monument are in classes III and IV. Given the high value associated with scenic vistas in, to, and from the monument, we recommend that these adjacent lands be reclassified to higher value VRM classes that would offer added protection to this important public resource. This is especially important for areas adjacent to Dinosaur National Monument proposed wilderness zones.

Solitude

5.09 82-4 Solitude is a very important resource value within Dinosaur National Monument. Through ambient sound monitoring, we have established a baseline that documents the near absence of man-made sounds in the monument. L90 sound levels in backcountry areas are consistently in the low to mid-20 dB range. L50 averages seldom exceed 30 dB. Developments on lands adjacent to the monument could result in significant deterioration to this resource value. Adoption of our recommendations relative to management level reclassification would significantly protect the quality of solitude in the monument.

Fire Management

82-5 We commend your plan for the inclusion in the preferred alternative of prescribed natural fire management. Our respective Fire Management Officers have coordinated fire management efforts for compatibility over the past several years and we anticipate that will continue under the final plan.

Several places in the document (e.g. page 2.21) refer to maintaining late seral or climax vegetation conditions on 60 to 70 percent of the subject lands. We did not find your rationale that describes the fire or other disturbance regimes that would set back seral stages. Perhaps in some situations with frequent natural disturbances, more of a mosaic of seral stages would be desirable.

Wild and Scenic Rivers

82-6 Alternative B (ecological systems) proposes consideration of Wild and Scenic River designation for both the "middle" and "lower" reaches of the Green River. The "middle" reach is that section immediately below Dinosaur National Monument. Alternative E (preferred alternative) proposes consideration of such designation for only the "lower" reach. Given the potential to better protect high-value endangered fish habitats and riparian zones, as well as consistency in considering designation of the entire Green River below Flaming

82-3 Visual resource classes, as used in this plan, were developed using standard BLM criteria by an independent contractor in 1979. We appreciate the National Park Service's concern over scenic vistas that go beyond monument boundaries, but feel the VRM classes as shown accurately describe the appropriate classes on the lands administered by BLM.

82-4 Thank you for your comments. As stated in the standard operating procedures of chapter 2 of the proposed plan, BLM will prepare site-specific environmental reviews before many of the actions proposed in this plan are implemented. The NEPA process calls for inclusion of consultation with private individuals, local governments and governmental agencies that would be affected by the proposed action. The proposed plan goes on to state explicitly that BLM-approved actions on public lands would be coordinated fully with adjoining landowners, local governments, and anyone with a valid existing right on the land (i.e., grazing permittee, mineral lessee).

82-5 Please refer to Table 2-15 under vegetation for ecological stages proposed by alternative. Management of the vegetation would be done by various practices of which prescribed burning is one. Refer to Appendix 8, Table A8-4 for rangeland management treatments or practices proposed by allotment. Refer to Chapter 4, under impact analysis of implementing the proposed plan regarding impacts from vegetation management to other programs.

82-6 Appendix 7 lists in detail the reasons BLM is not proposing to recommend the middle reach of Green River for designation as a Wild and Scenic River.

82-6  
Cont.

Gorge Dam, we suggest that the preferred alternative be amended to recommend consideration for both the "middle" and "lower" reach of the Green River within the Resource Area.

#### Recreation Development

82-7

The document notes that recreation facilities may be developed in areas near Dinosaur National Monument (e.g. Jones Hole area). The Monument staff looks forward to cooperating with BLM in planning and design efforts to ensure our respective developments are compatible with efficient visitor services and protection of resources and resource values.

#### Grazing

5.100

82-8

The RMP/DEIS notes continuation of grazing by domestic livestock adjacent to the monument in all of the alternatives. With each alternative there are shades of differences in how that grazing will be authorized and managed. Grazing adjacent to the monument, particularly where the boundary is unfenced, has direct and indirect impacts on park resources and resource values. As you know, grazing of domestic livestock is generally prohibited on lands administered by the National Park Service. Recent history has shown that where early consultation is lacking in our respective management of grazing, both Agencies and the permittee are impacted. We make two recommendations relative to management of grazing:

1) The DEIS should be amended to acknowledge the impact of permitted grazing on BLM lands to park resources and resource values as a result of trespass grazing. These problems (existing and potential) can be significantly reduced by construction and maintenance of adequate boundary fences. The DEIS should note that more efficient use of BLM lands and protection of park resources would accrue with BLM participation in boundary fencing programs.

82-9

2) In implementation of the RMP, earlier and more complete coordination and consultation in the design and location of range improvements, water developments, and grazing systems will significantly reduce the potential for impacts to park resources and conflicts with authorized BLM permittees. We again recommend that both Agencies endeavor to maintain such coordination and consultation.

#### Threatened and Endangered Species

82-10

The document should be amended to reflect completion of the formal endangered species listing process for Ute Ladies Tresses orchid (threatened) and razorback sucker (endangered).

#### Employment

82-11

Table 4-3 (page 4.14) projects impacts to jobs by alternative. That table is drawn from a U.S. Forest Service publication without reference to its

82-7

Thank you for your comments and offer of assistance.

82-8

The Wild Mountain area you may be referring to is within Colorado, and is outside the management boundaries of DMRA. The management responsibilities for Wild Mountain lie with the Little Snake Resource Area of the Craig District. DMRA administers the area in conformance with the management direction contained in the Little Snake RMP. We agree, trespass problems from BLM-permitted livestock drifting onto National Park Service-administered lands must be solved through continued coordination and consultation efforts. It is however the grazing permittee's responsibility to insure BLM-permitted livestock remain where authorized. New range improvements on BLM lands will be planned in such a way to minimize trespass problems occurring on National Park Service-administered lands. We also agree fencing through a cooperative effort may be a solution to a trespass problem.

82-9

See our response 82-8 above.

82-10

Thank you. Chapter 3 has been updated to show the most current status for Ute Ladies Tresses orchid and razorback sucker.

82-11

This table has been deleted.

82-11 Cont. applicability to the BLM RMP alternative. Given current levels within the Diamond Mountain Resource Area, it seems questionable that adoption of Alternative B would result in a loss of 3,100 jobs in the oil and gas industry. We recommend that supporting documentation be provided or that this table (and similar narrative) be deleted.

Paleontology

82-12 On page 2.34 the plan calls for surface collection of fossil invertebrates and plants and later amateur collection of fossil vertebrates (pending BLM approval). This is to occur in areas identified as having High Sensitivity (page 3.6). The proposed management actions are inappropriate for the noted sensitivity of the resource. The professional paleontology staff at the monument is familiar with some of the exposures and formations in these areas and some fossil invertebrates and plants that would be of high scientific significance if they were found in these areas. The blanket assumption that fossil invertebrates and plants are not significant is erroneous. The potential for significance needs to be evaluated for each formation before open collection is allowed.

82-13 The collection of fossil vertebrates by other than scientific institutions should not be allowed. Rarity and uniqueness of fossil vertebrate remains mean that most specimens will have high scientific value that will be lost if amateur collection is allowed.

82-14 These activities will be occurring on lands contiguous to Dinosaur National Monument. It is our historical experience that opening adjacent areas to amateur collecting will have negative impacts on our resources through increased illegal collecting.

82-15 On page 3.5, the chart showing paleontological resources is highly biased towards vertebrate fossils. No mention is made of potential for significant plant and invertebrate fossils. A more comprehensive scientific evaluation is needed for this section (the source listed is the Vernal District files).

82-16 According to your draft plan, over 300 fossil localities are known with only one percent of the land surveyed, yet all the land is to be opened to amateur collection. Such richness should dictate continued closure at least until an adequate baseline inventory and scientific evaluation has been done.

82-17 On page A1.2, the paleontological mitigation guidelines noted are those of the Utah State Paleontologist. There is no indication that they will be adopted by BLM, how they will be implemented, or how such actions will be used to manage areas as a result of this planning document. Nearly all the classes of paleontological sites listed require some mitigation. Only the last, Class V, requires no mitigation. Even then, intensive survey is required before this class ranking is to be assigned. The plan simply calls for opening the area for amateur collecting of fossil plants and invertebrates. The apparent preferred management action is not in consonance with the mitigation chart in the document.

82-12 The paragraph you refer to has been changed in the proposed plan, please refer to Table 2-15. The potential for significance will be evaluated for all formations within areas proposed for collection.

82-13 The paleontological resources section in the proposed plan has been changed to consider both plant and invertebrate fossils. The paleontological resource map in Chapter 3 of this document, has been modified to include additional highly sensitive paleontological zones. Casual use collection of vertebrate fossils within the resource area will not be allowed. However on a case-by-case basis, collection of vertebrate fossils by a scientific institution could be considered.

82-14 All lands will not be open to collection. Collection will be permitted only at specified locations following BLM approval.

82-15 Our intent is to follow the mitigation guidelines developed by the Utah State Paleontologist. It should be noted that BLM's policy on management of paleontological resources is still being developed. The BLM State Paleontologist will work closely with the Utah State Paleontologist in finalizing this policy. The chart showing paleontological resources has been expanded in the proposed plan.

82-16 Please refer to the response provided above to comment 82-15.

82-17 Paleontological inventories will be conducted on all sensitive formations before surface disturbing activities will be permitted. If fossils are found, their significance will be evaluated and if necessary mitigated through avoidance or excavation by qualified individuals. Amateur collecting will be closely regulated by BLM.

5.101

82-18 The plan does not adequately address paleontological resources. The potential for scientifically significant material is high for the areas covered by the plan, yet there is no attempt or plan to inventory and access those resources. Management actions appear to be based on seriously deficient baseline data.

82-19 There is no discussion on how development (roads, stock ponds, etc.) on these lands will impact fossils or how such impacts will be mitigated. Overall, the plan proposes activities that will in all likelihood result in the loss of valuable scientific material. In addition, unregulated amateur collecting in areas contiguous with Dinosaur National Monument lands poses a strong potential threat to our own nationally protected fossil resources.

National Natural Landmarks

The National Park Service administers the National Natural Landmark (NNL) program. The purpose of the program is to identify significant ecological and geological features that make up our Nation's rich natural history. The objectives for the program are: 1) to encourage the preservation of sites illustrating the ecological and geological character of the United States; 2) to enhance the scientific and educational value of sites thus preserved; 3) to strengthen public appreciation of natural history; and, 4) to foster a greater concern in the conservation of our Nation's natural heritage.

The following potential NNL's are within the Diamond Mountain Resource Area:

- 1) Ashley Creek Canyon
- 2) Asphalt Ridge
- 3) Sheep Creek Canyon
- 4) Sheep Creek Narrows
- 5) Hickerson Park
- 6) Castle Cliffs of Duchesne
- 7) West Hanna Narrows
- 8) Hidden Valley Badlands
- 9) Duchesne River Bluffs

Enclosed are copies of the approximate locations and descriptions of each area from our files and informational materials on the NNL program. Please consider the opportunities to preserve our Nation's natural heritage in the Diamond Mountain Resource Area Management Plan. Please contact Cheryl A. Schreier at (303) 969-2929 if you have questions regarding these potential NNL's.

82-18 We believe the changes to made to Alternative E in response to public comment as reflected in the proposed plan are adequate.

82-19 Please refer to our response 82-17 above.

82-20 Of the 9 potential National Natural Landmarks (NNLs) listed in your comment, only two, Ashley Creek Canyon and Asphalt Ridge, contain public lands surface managed by BLM.

Ashley Creek. That portion of the potential NNL south of the Ashley National Forest contains Ashley Springs which is used by much of Ashley Valley for both culinary and irrigation water. It also contains a culinary water treatment plant. All public land in the area is withdrawn to protect this important water supply. Our position is that the portion of the potential NNL on public land does not meet the criteria for designation and should be removed from further consideration.

Asphalt Ridge. Of the 640 acres in this potential NNL only 40 acres are controlled by BLM. The area is being actively mined by Uintah County for road asphalt. It is our position that the area's principle value is as a source of asphalt. It does not meet the criteria for designation and should be dropped for further consideration.

RESPONSE TO COMMENT LETTER 83 (COBBS)

83-1

We appreciate your concern. Please refer to our response 12-1.

Carl E. and Myrna A. Cobbs  
1728 East 1700 South  
Vernal, Utah 84078

March 27, 1992

Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

Attn: Penelope Smalley - Team Leader

Re: Diamond Mountain Resource Management Plan

Dear Ms. Smalley;

In reviewing the Diamond Mountain Environment Draft Statement, we have come to the conclusion that it is so complex and not understandable that I and my wife are both having real problems trying to come up with the logic that this statement is trying to make.

We have a small summer home on Pot Creek and we also own land in the Warren Draw. We have studied your proposals and our recommendation would be to let the B.L.M. manage their property in exactly the way they have during the past years and not to try to impose the environmentalist ideas into a plan that will not work.

We are completely opposed to opening public roads through private land ownership areas. There are so many problems associated with the taking of private ownership rights that we recommend and ask that these proposed actions be taken out of this environmental statement.

Leave the Davenport, Lambson, Jackson and Warren Draws as they are. Leave Red Mountain and Ashley Creek as they are.

  
\_\_\_\_\_  
Carl E. Cobbs

  
\_\_\_\_\_  
Myrna A. Cobbs

CEC/MAC/jk

5.103

83-1

March 26, 1992

Penelope Smalley-Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

To whom it may concern:

This letter is about the Diamond Mountain Management Plan and Environmental Impact Statement in the Jackson Draw area.

After reviewing the above plan it is my understanding that the organization is intending to make a road from the Jackson Draw to the Davenport Draw by way of Maimes Hole and create a picnic area in Bear Hollow.

84-1  
5.104  
These plans are not in the best interest to the many different types of wildlife in the Jackson Draw area. For instance, Maimes Hole is one of the popular calving sites for the elk in the Jackson Draw. If this is disrupted they will have to move on to other sites. The road and picnic area will also bring in more hunters to go along with the already diminishing elk and deer herds in the area. It is my feelings that these plans are going to bring more people into the area and move the wildlife out.

As a sportsman and outdoorsman I have seen what unlawful people can do to roads and lands. They cut fences, harass cattle, litter and trespass on to private land without permission just to name a few. If we let this action pass these areas are not going to be the same as they have been for generations.

It is not only the outdoorsman and wildlife that are being punished but also the land owners whom have ranched these lands for generations. And now you tell them they have to make public access through their lands.

It is my concern that these actions should be removed from the Management Plans.

Concerned

DUSTIN HENLINE

RESPONSE TO COMMENT LETTER 84 (HENLINE)

84-1 Thank you for expressing your concern. Please refer to our response 12-1.

Vernal, Utah

To: Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

As a concerned citizen I would like to comment on the Diamond Mountain Resource Management Plan and Environmental Impact Statement.

Although my comments could pertain to many other areas of Diamond Mountain I would specifically like to direct my concerns to the Jackson Draw area since I am familiar with this section. As I understand it most of the meadowlands and water is owned by the Backing and McCoy family, and I would like to commend them on the way they have handled the problem of trespass in the past, not only trespass but access to BLM land which is of course what this is all about.

I have had the privilege of hunting in this area for many years. And in that time I have seen many other hunters, some with permission to trespass and others with no permission. I might add that most of the people that trespass without permission do not even contact the landowners to ask for permission. I have seen both elk and deer killed and left for the coyotes and birds of prey, I have also seen the meadowlands torn up by four wheel drive trucks in the wet season, fences knocked down and gates left open, and still these landowners let many hunters on their property and all they ask of us is to protect what is rightfully theirs.

Another thing that concerns me very much is the portions of the Jackson Draw, specifically "Malmes Hole" and "Bear Hollow" are both calving areas for as many as 250 head

85-1  
response 12-1.

Thank you for expressing your concerns. Please refer to our

of elk. I have observed this every spring for many years. Both of these areas can be seen with binoculars and spotting scopes from the county road, so there should no need to any type of road access into these areas.

One more thing I should mention is what seems to be the growing number of moose in this area. Last year 1991, I observed 5 moose in the Malmes Hole area during the general elk hunt. Also almost every year several bear are spotted in this general area, and again all of this can be seen from the main road that goes through the Jackson Draw. Now you tell me what is going to happen if public access is allowed in these areas? I'm sure we all know it would have a very adverse effect on the wildlife in this area.

Going back to the issue of the BLM land in the Jackson Draw, anyone wanting to gain access can do so from either the south or north ends and also from the Warren Draw to the east. So what could possibly be gained by opening up public access through the very delicate meadowlands which are privately owned, other than creating many bad feelings between landowners and concerned citizens but, most infringing upon what seems to be a haven for deer, elk, moose and mt. lion.

I hope you will consider my input in any future plans for whatever changes are made in this very special area of Diamond Mountain.

Yours Truly,

Karl J. Baese- owner Split Mountain Motel  
1015 East Hwy 40  
Vernal, Utah 84078

801-789-9020

5.106

85-1

Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

RE: Diamond Mountain Resource Management Plan

Attn: Penelope Smalley, Team Leader

Dear Ms. Smalley;

After reviewing the Diamond Mountain Environmental Draft Statement, I feel it is my duty as a sportsman and a supporter of the outdoors to express my feelings on this issue.

My concerns are particularly focused on the area of northern Diamond Mountain - including the Davenport, Lamson, Jackson and Warren Draws. Most of the area consists of FEE lands which are mainly in the low lying areas of the Draws and are particularly used for grazing by the land owner or the lessee. The remainder of the land being B.L.M., State & National Forest.

During the past decade my family and I have enjoyed some of our most memorable moments in these areas, mostly due to the fact of limited accessibility to the area. The abundance of wildlife in the area in my opinion is contributed to this fact. We have witnessed the ELK calving seasons, ELK & DEER rutting seasons, BEAR, MOOSE and MOUNTAIN LION. (FROM THE MAIN ROAD !!)

If public access is opened in these areas to allow anyone to roam through PRIVATE land to reach one destination or another then Diamond Mountain as we now know it, will not be what we had hoped that our children and grandchildren could enjoy. There is plenty of access to state and federal lands now if people would decide that there are other ways to reach an area other than a four wheel drive pickup. Some of the tops of these draws are as close to a wilderness setting as the people in this area will likely see. If it is ruined by roads then that distinction can never be regained.

Another concern to me is the landowner which seems to be affected as much as our wildlife and habitat. In most cases their ancestors homesteaded the mountain land for the use of its rich grass lands for grazing. The thought of seeing a public access through the middle of one of the very large pastures makes me cringe. The land owners have a lot of time, money and sentimental value into their land and I do not think that anyone has the right to change or alter their property in any form without their consent.

## RESPONSE TO COMMENT LETTER 86 (HENLINE)

86-1

Thank you for your concerns. Please refer to our response 12-1.

5.107

86-1

I think that the B.L.M. should focus their concerns on protecting the resources and not try so hard to expose that which we still have. I highly recommend that the actions which I have addressed be removed from the Management Plan.

Concerned:

TRACY D. HENLINE

TDH/tdh

March 17, 1992

Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

ATTN: Penelope Smalley

Gentlemen:

As a concerned citizen I would like to comment and express some opinions pertaining to Table 2-13, Lands and Realty, in the access portion of Table 2-13. According to alternative E, which is the Bureau's preferred alternative, you are seeking public access through privately owned property. My main concern in this proposal is the Jackson Draw portion, with which I am most familiar.

The Hacking's and McCoy's are the only land owners in the Jackson Draw and are opposed to any further access through or across their private property. They already have a public road right through the heart of their property. From this road they have lost a number of livestock over the years, to both vehicles traveling at excessive speed, or being shot.

Furthermore, there is not one spot along the Jackson Draw where a road would not disturb some kind of archeological site. I talked with a B.L.M. representative at the Elk Expo in Salt Lake City. According to the gentleman, the Bureau was not going to push an access on anybody that didn't want it. I hope very much this is true.

I, along with many others, have been fortunate enough to have access to this area. These land owners are very good to deal with, yet they are always having trespass problems during the hunting seasons. This is mainly due to hunters shooting game off from the main road. Any further access via road would greatly intensify this problem.

There is access to either side of the Jackson Draw. From the south there is D.W.R. property that joins the B.L.M. land, from the north there is National Forest property and from the east there is D.W.R. property that joins B.L.M. land. So for those willing to gain access, it's already there.

I suspect that whomever proposed or is wanting this access, probably wants to be able to road hunt more of this private property.

5.109

This area, the Jackson Draw, is a haven for many species of wildlife, even though there is a very heavily used public road right through the heart of it. In the spring it serves as a calving ground for a large herd of elk and many deer. The moose in this area have been on the increase for the past ten years. The area, as is, supports bear and cougar in a fair amount. Any further access would severely impact this ongoing habitat.

Please, before you take any of the access issues in the Land and Realty sections in table 2-13 into any further action, consider the impact on the wildlife, land owners, and archeological sites, that it may effect. I think you need to do a little more homework on the issue. As an advocate of more habitat for wildlife, I believe that fewer roads mean more habitat.

87-1 I am strongly opposed to public access in the Jackson Draw area. Thank you for your consideration of my comments.

Very truly yours,  
*Nolan Massey*  
Nolan Massey  
1398 West 400 South  
Vernal, Utah 84078

87-1 Thank you for expressing your concerns. Please refer to our response 12-1.

Attention: Jean Sinclair  
Bureau of Land Management  
Vernal District

MARCH 19, 1992

As a concerned citizen and a person who truly enjoys the recreation offered by our area, I would like to comment on the Diamond Mountain Resource Management plan and Environmental Impact Statement, specifically the Area of Diamond Mountain known as "Jackson Draw".

During the past several years I have had the privilege of watching the Elk herd increase in this area. Not only have the elk increased but also the moose population seems to be grazing along with the bear. All of these animals, I and my family, have watched from the county road. In my opinion, more roads would only serve to drive the wildlife back farther and out of sight, not to mention the loss of wildlife due to poaching and loss of habitat. In a time when we hear and talk so much about preserving wildlife & wildlife habitat, it seems senseless to push more roads, campgrounds and other access, back into these prime calving grounds for elk.

After we build these roads, which unrightfully takes land away from the land owners, and push the wildlife back out of sight, what then? Will we build more and more roads back until

RESPONSE TO COMMENT LETTER 88 (HOLMES)

88-1

Thank you for expressing your concerns. Please refer to our response 12-1 and 12-2.

the wildlife has no place to go? This area is already riddled with enough roads. As it is, the beauty of this Area can be enjoyed from the County road which seems to be a safe distance from the animals. For those who are a little more ambitious and care to hike, there is plenty of access to these areas from the north & South ends of Jackson Draw.

In years past I have also witnessed the destruction of private & public lands by vehicles. Some people just don't care. Grassy meadows, fences, ponds and springs all have been destroyed by those who don't care. Why should the private landowners have to suffer the loss and destruction? Past experience proves that it cannot be stopped.

Please consider those thoughts and the opinions of others like myself before taking any more than we already have from the landowners and the wildlife.

Thank you for your time.

Yours sincerely

Allan Hansen

RESPONSE TO COMMENT LETTER 89 (HOLMES)

89-1

Thank you for expressing your concerns. Please refer to our response 12-1 and 53-1.

3-15-92

Bureau of Land Management  
Vernal District  
Attention: Jean Sinclair

As a long time resident of Vernal Utah and one who has enjoyed the Mountains in our area, especially Diamond Mountain I have felt an urgency to comment on the Diamond Mountain Resource Management Plan and Environmental Impact Statement, particularly the area of Diamond Mountain known as Jackson Draw.

I feel that further development of any kind in this area would not serve any truly useful purpose but instead be very detrimental to wildlife habitat and create a situation impossible to control for the land owner(s).

There are several different species of wildlife that can be observed from roads that are a safe distance from where these animals feed, Calves in the Spring etc.

I feel the land owners have been more than fair in allowing hunters and others to cross their land when permission to do so was requested.

If I could see where there was a need for further development of Roads, Campgrounds, etc. in this area, and if I felt like we have would come to the wildlife that can be seen there, I would surely support the Management Plan proposed. But as it is I would like to go on record as being very much opposed to it. Please consider my feelings have expressed.

Sincerely,  
M. R. Holme  
38525-1504 G  
Vernal Utah 84078

89-1

5.113

March 18, 1992

Penelope Smalley, Team Leader  
BUREAU OF LAND MANAGEMENT  
Vernal District  
178 North 500 East  
Vernal, Utah 84078

Subject: Comments Concerning the Draft Diamond Mountain Resource  
Area Resource Management Plan and Environmental Impact  
Statement of November 1991

The Bureau of Land Management (BLM) has prepared a detailed document explaining the plans for management of the Diamond Mountain Resource area, and environmental impacts anticipated due to activities within the Resource area are outlined. We understand that this document now in draft form will eventually be modified into the final RMP/EIS which will guide the decisions made concerning the Resource Study lands administered by BLM in the future.

In general, Moon Lake Electric supports the recommendations of the Draft Resource Management Plan and Environmental Impact Statement (DRMP/EIS). The DRMP/EIS represents a very significant effort in defining existing uses, future issues, and probable environmental impacts which may be created by activities expected on BLM administered lands. Defining guidelines which will be used to help manage and resolve future issues is usually quite beneficial for everyone involved.

As a public utility serving a large part of the area within the Resource boundaries, we are very sensitive to impacts resulting from the BLM decisions regarding their administered lands in the following categories:

1. Developments which are allowed to occur within our service territory.
2. The regulations governing maintenance of existing power lines and rights of ways.

3. The regulations governing new extensions of power lines .

Being subject to the BLM regulations imposed upon us usually increases cost and introduces time delays for providing service to our members when BLM lands are involved compared to when they are not involved. We recognize that many of the regulations result from Congressional mandate, and do not originate within the BLM. When the reasons for added expenses are understood, reasonable, and affordable, we comply willingly to meet the requirements and accept the additional costs.

There is a proposal within the DRMP/EIS which causes us much concern however. This proposal is for the reintroduction of the Black-footed Ferret in two (2) or less of several possible locations. We believe that the results anticipated and the impacts that are probable from such an action are unacceptable and therefore should be avoided. We question the wisdom of such activities in an area where, if the Black-footed ferret did once reside, conditions evidently changed to eliminate the species. Reintroduction of this endangered species into this area with all the related problems which will result does not seem like wise management. It could become a rather expensive experiment.

We note that the DRMP/EIS states that power lines would be required to avoid the Black-footed ferret reintroduction areas or they would need to be buried or designed to preclude raptors from using the power lines as hunting perches. While these alternatives are viable, the additional expense for a selected alternative can be significant. Who must bear such increases above normal expenses? We do not see the BLM statement that since this is in the interest of the citizens of the United States to reintroduce the Black-footed ferret, that BLM will help with the additional expenses to limit impacts such that alternatives remain cost neutral to those who would otherwise be directly impacted. We feel that should be one of the criteria used to recognize the costs of such a project, and that such expenses should be analyzed for costs and benefits.

We understand that the guidelines for management of this issue would allow some activities within the reintroduction areas. However, we do not feel that the complete facts are

90-1 The decision for the reintroduction of black-footed ferrets has been modified. Please refer to Table 2-15 for the proposed decision. The Endangered Species Act and subsequent Bureau policy and guidance directs DMRA "...to conserve ecosystems upon which endangered and threatened species depend." The act further states that: "...it is the purpose of congress that all Federal departments and agencies shall seek to conserve endangered and threatened species and shall utilize their authorities in furtherance of the purpose of this act." (Section 2(c)(1)).

We believe it is wise management to maintain species diversity which maintains ecosystem stability. Species diversity is a good indicator of the health of the individual habitats. The proposed reintroduction sites have been evaluated and the most recent information suggest the sites meet minimum USF&WS guidelines for the reintroduction of black-footed ferrets. These sites would need to maintain these qualities for two years prior to reintroduction to ensure suitable conditions exist at the time of release. All releases would be classified as "experimental nonessential" which allow the management flexibility to assure that black-footed ferrets will not significantly impact existing or future land uses on public lands.

All costs associated with powerline modifications to preclude raptors from perching on them within the black-footed ferret habitat would be paid by the company proposing the development. We believe that anti-perching structures provided on powerlines would not be a significant additional expense to the company proposed the powerline.

90-1  
5.115

Penelope Sualley, Team Leader  
March 18, 1992  
Page 3

represented. We have had significant delays in projects introduced because of the timing of projects in areas suspected as the habitat for Black-footed ferrets on BLM administered lands. Such delays have affected us in that we could not even survey for power line centerlines during certain times of the year, and the timing of construction was limited to only a few months of the year. We have had to pay for studies about ferrets which were done by expensive consultants without any benefits to show for the studies other than the fact that no Black-footed ferrets were observed. We have had customers that have experienced worse problems than we have because of overzealous concern for the Black-footed ferret. We fear that the possible failure of the experiment to establish the Black-footed ferret could result in similar impacts as above for many, many years.

The areas for reintroduction of the Black-footed ferret are not confined to small parcels of land. The areas cover rather significant amounts of land. This land will have limited activities immediately when the final RMP/EIS is approved even prior to when the ferret is reintroduced. This has the effect of limiting resource development which may not be in the best interest of the United States or its citizens.

We urge the BLM to reconsider the reintroduction of the Black-footed ferret into this area, and to eliminate this proposal from the final RMP/EIS.

Sincerely,



Kenneth A. Winder  
Manager - Engineering

5.116

RESPONSE TO COMMENT LETTER 91 (WAKE)

March 29, 1992

Dear BLM:

Of the various alternatives in the Diamond Mountain RMP, I support **Alternative B**. For too long, the BLM has ignored an ecological systems approach to land management. You quote Aldo Leopold at the beginning of the RMP, but show little understanding of what he stood for. For example, while the RMP goes on at length about economics, it says virtually nothing about biodiversity. The long term health of the land and of the life on it should be your #1 priority. Alternative B comes closest to managing for these values.

91-1

If you choose your preferred alternative, "E," please incorporate into it the modifications proposed by the Uintah Mountain Club, which provide a bare minimum standard for wise land use.

Regardless of which alternative you chose, please designate all of Red Mountain as an ACEC and as a *semi-primitive nonmotorized area*, under *level 1 management* with a VRM class 1 designation. It does in fact meet the criteria. From my reading of the RMP, you seem to understand the values of the upper part of the mountain, but you've completely overlooked the lower part of the mountain which includes the slickrock areas from the arch across to the pinnacles and fins. This is a spectacularly beautiful area, the prettiest in the basin, and one of the most fragile. It has a riparian area, geologic formations to rival southern Utah's, forage for wildlife, petroglyphs, and an abundance of cryptogamic soils being torn up by OHVs, resulting in a lot of erosion. Please note that it is essential that you acquire state sections 16 and 2, especially section 16. The mountain should also be closed to mountain bikes and to rock climbers placing fixed (permanent) protection.

91-2

I also hope to see more protection for the Browns Park area, the reintroduction of ferrets into the resource area, Wild and Scenic Status for the Green River, and a very much stronger emphasis on identifying and protecting the habitats of existing endangered species. You know you could have some on Red Mountain. Shouldn't you check it out before risking getting into hot water and having to do an expensive and painful recovery project because you let the ORV people buffalo you into giving them access anywhere? Finally, I really revile bear baiting. You should make hunters on public lands get off their butts and be sportsmen by banning bear baiting, and for that matter, hounding as well.

91-3

Thanks for your consideration.

Nicki Wake  
848 W. 400 S.  
Vernal, Ut 84078

91-1 We agree with your concern regarding the long-term health of the land and the life dependent upon it being our number 1 priority. However we must disagree with you on the matter of biodiversity. Although the term "biodiversity" is consciously not used, the terms "species diversity" and "vegetation diversity" are used throughout this document in their proper context, which incorporates the concept of biodiversity. We believe a general definition of biodiversity (now included in the glossary) has in fact been followed from the outset. An interdisciplinary team of specialists developed the documents; representing the resource values and programs effecting the nonliving and living (including human) components of the ecosystems within the resource area. These specialists forged alternative plans and decisions with the overriding awareness of and concern for the inherent dependence and interconnectedness of these ecosystems' parts.

91-2 Thank you for your comment. Please refer to our responses 79-2 and 12-1.

91-3 It is recommended in the proposed plan that the Browns Park area be managed as an ACEC. Management prescriptions for this area are contained in Table 2-18. It is also proposed to reintroduce black-footed ferrets on one suitable site, as well as ending the issuance of bear baiting permits on public land. All of the alternatives in the RMP would protect the habitat of existing endangered species, but we believe the best emphasis is stated in the proposed plan. We concur with your statement concerning the need to identify special status animal species habitat. We currently show no endangered or threatened species utilizing habitat on Red Mountain. We continue to update our data with new inventories and will continue to monitor the known habitat to ensure protection is maintained.



## THE WILDERNESS SOCIETY

CENTRAL ROCKIES REGION

March 25, 1992

Jean Nitsche-Sinclear  
Vernal District BLM  
170 South 500 East  
Vernal, UT 84078

Re: Diamond Mountain Resource Management Plan DEIS

Jean Nitsche-Sinclear:

The Wilderness Society is a non-profit conservation organization dedicated to the preservation and wise management of America's public lands and natural resources. We have approximately 2000 members in Utah, and 136,000 nationwide. All our member value and benefit from the public resources on the Vernal District and Diamond Mountain.

### The Wilderness Society Supports Alternative B

This alternative would not only enhance natural values but provide setting in which long term, sustainable economic development could be enjoyed by the local population. Livestock grazing would remain at present preference unless reductions are indicated. Surface occupancy mineral activities would be allowed on nearly half of the entire resource area with no surface occupancy mineral activity allowed on the entire balance. Seventy-eight percent of the resource area would remain open to off-highway vehicle use. Riparian areas and watershed would be protected. This alternative serves the greatest public interest with the exception of unnecessarily restricted access. Alternative E's access guidelines are more appropriate.

It is essential that mineral development not be allowed in critical or crucial wildlife habitat, sensitive watersheds areas, or in areas of high scenic value. The short term economic gains from extraction could only be gained by the loss of these other

Utah Office

Walker Center • 175 So. Main Street • Salt Lake City, Utah 84111  
(801) 355-4742 • FAX (801) 575-5202

RESPONSE TO COMMENT LETTER 92 (WILDERNESS SOCIETY, Leeson)

92-1 Management prescriptions outlined in the proposed plan will provide adequate protection for crucial wildlife habitat, sensitive watershed areas and areas of high scenic value either through mitigation measures or avoidance.

5.118

92-1

92-1  
Cont.

values which themselves have not only ecological and recreation value, but economic values of their own. It is essential that phosphate mining, for example, be disallowed in these areas.

92-2

The scenic and recreation values of the slickrock country north of Steinaker deserve greater protection. This area should be managed specifically to protect and facilitate non-mechanized recreation opportunities.

92-3

The DEIS has failed to provide sufficient protection for the unique paleontological and archeological resources in the resource area. The final plan should include management prescriptions for protection.

92-4

In the event that the two WSAs are not designated wilderness, the RMP should provide for ACEC designation.

Why Do the Other Alternatives Not Serve the Public Interest?

92-5

Alternatives C and D are serious departures from multiple-use, sustained yield management objectives. It is appalling that these alternatives ignored so many management imperatives. They violate FLPMA, violate the agency's own Riparian-Wetlands Initiative, and all but ignore non-discretionary protection of wildlife and listed species critical habitat.

Rivers Protection

5 119

92-6

It is important that both the Upper and Lower Green River be protect under the Wild and Scenic Rivers Act.

Grazing

92-7

The DEIS has utterly failed to justify continued grazing on any of the allotments that are in less than good condition. Only 28 allotments in the entire resource area are in satisfactory condition. All of the other allotments have or may have conflicts with other resources. Keeping these allotments in the suitable grazing land base is questionable and should have been analyzed. Even Alternative B fails to adequately protect wildlife habitat, plant communities and watersheds from the negative impacts of livestock grazing.

92-8

The rangeland projects briefly described include many vegetation conversions but provide no description or discussion or justification for such conversions. It is unacceptable that the final plan would authorize, even at the programmatic level, such plant community changes without full discussion of the need and impacts.

92-9

Nineteen riparian areas are in unsatisfactory condition yet these areas have not been removed from suitable grazing land base.

I appreciate the opportunity to participate in this important planning process.

Sincerely,  
*Jane Leeson*  
Jane Leeson

92-2

Thank you for your comment. Please refer to our response 12-1.

92-3

The section on paleontological resource has been revised. Please refer to the responses provided to 82-13 through 82-17. It is our opinion that archeological resources have been addressed adequately in the plan. Federal law mandates protection of cultural resources.

92-4

Please refer to our response 77-5.

92-5

BLM believes Alternatives C and D are consistent with the laws, regulations, and policy guidelines governing management of public lands refer to the planning criteria outlined in Chapter 1. As stated in Chapter 2: "Each alternative is a complete, reasonable, and implementable resource management plan, in which the different management practices are described, and the different ways of achieving balanced resource management under different management priorities are discussed."

92-6

Thank you for your support. The recommendation to designate both the Upper and Lower Green River for inclusion in the Wild and Scenic River System has been continued into the proposed plan.

92-7

You are referred to Appendix Table A8-6. There are 94 allotments designated in satisfactory range condition; 14 in unsatisfactory condition. The categories are a general overall determination of vegetation health on an allotment. Although an allotment may have been placed in satisfactory condition, it may contain localized resource-specific problems or concerns. The high number of "I" allotments or "Improve" category is due primarily to high wildlife habitat potential or riparian improvement needed (please see Appendix 8 for a description of the allotment categorization process).

92-8

Grazing can be managed for improvement of vegetation resources. Refer to Chapter 2 under vegetation resources in the management common to the proposed plan and all alternatives, relating to livestock grazing as one of many vegetation treatments to achieve improvements to resources or a desired ecological stage or plant community. We believe ecosystems are adequately protected from livestock grazing where permitted in all alternatives. Please refer to Chapter 2 Management Guidance Common to the Proposed Plan and all the Alternatives, livestock section.

92-9

As stated in Table 2-15 under riparian in the proposed plan, riparian improvement will be accomplished by rangeland improvements and grazing systems designed to enhance riparian areas. Livestock grazing would be discontinued on riparian areas that do not respond to improved grazing management.

Chapter 5 - Coordination and Consultation

**Uintah Special Service District**

P.O. Box 144  
Vernal, Utah 84078  
Mar. 26, 1992

(801) 789-4636

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal Utah 84078

Comments on DRAFT EIS Diamond Mountain Resource Area RMP.

1. The Diamond Mountain Resource Area Plan should consider existing county roads in all Public Lands decisions.

A. Page 1.10 under RIGHTS-OF-WAY fails to consider the existing RS 2477 rights-of-way established by Uintah County, including roads BLM has previously recognized. For example there is an agreement signed by BLM District Manager, and State Director and the Uintah County Commissioners in 1981 acknowledging RS 2477 rights-of-way within the County and District. I can find no mention or reference to those rights-of-way.

B. Page 3.20 ACCESS AND ROADS states that roads are maintained by the county, but fails to acknowledge the existence of the numerous RS 2477 County roads within the Resource Area.

2. Page 3.69 Table 3-25, Russian Olive and Halogeton should be added to the undesirable plant species occurring within the RA because of their impact or possible impact on Public Lands.

*Thom Wardell*  
Thom Wardell  
Manager



"Moving the Basin Ahead"



**RESPONSE TO PUBLIC COMMENT 96 (UINTAH SPECIAL SERVICE DISTRICT, Wardell)**

96-1 The issue of county RS 2477 rights-of-way is an administrative matter. When implementing the land use decisions we will make an administrative determination as to the effect of the decision on the status of such roads.

96-2 Thank you for your information. Halogeton is discussed in Chapter 3 as a noxious and poisonous plant. We recognize Russian olive to be a county-noxious weed. We have added both to the list in Chapter 3.

96-1

96-2

5.120

11564 88TH AVE CT NW  
TACOMA WA 98498  
March 25, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management  
Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

Dear Ms Smalley,

We are opposed to any development in the Wams's Hole and  
Bear Hollow areas of the Jackson Draw. A road would destroy the  
remote beauty of these places, erode the mountain side and  
require the cutting of evergreen and aspen trees that have stood  
untouched for centuries. The wildlife would be displaced by the  
intrusion of humans into their environment.

Do not destroy our children's and grandchildren's children  
opportunity to see a part of the Old West as it has been for many  
years. The building of roads is not the best use of the  
mountain peaks in Jackson Draw. There are roads all over the  
Uintah Mountains among the downed timber. Please preserve the  
land as it is for future generations.

Sincerely yours,

*Delilah & David Badger*

Delilah and David Badger

RESPONSE TO COMMENT LETTER 97 (BADGER)

97-1 Thank you for expressing your concerns. Please refer to our  
responses 12-1 and 53-1.

97-1

5:121

111 South 200 West  
Springville UT 84663  
March 23, 1992

Jean Sinclair  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

Dear Ms Swalley,

Regarding: Diamond Mountain Resource Area Resource Management  
Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

The building of roads into Mame's Hole/Bear Hollow areas is not  
the best use of these quiet wildlife inhabited mountain areas.  
Please leave us some areas to show our children and grand  
children and great grandchildren that are not criss crossed with  
roads that have required the cutting of trees and the destroying  
of the mountain sides.

We are opposed to any development of the Mame's Hole/Bear Hollow  
and Jackson Draw areas.

Sincerely yours,

*Debbie, Scott Storie*

Debbie and Scott Storie

RESPONSE TO COMMENT LETTER 100 (STORIE)

100-1 Thank you for expressing your concerns. Please refer to our  
responses 12-1 and 53-1.

100-1

5.122

6047 E Redwood RD  
Salt Lake City UT  
March 23, 1992

Jean Sinclair  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

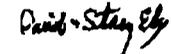
Regarding: Diamond Mountain Resource Area Resource Management  
Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production

We are opposed to any access or campground into the Mame's Hole-  
bear Hollow and Jackson Draw area. This area should not be  
disturbed but preserved in its remote primitive state.

These areas should not be destroyed by buildings new roads up the  
sides and over the tops of the hills. When I travel in Jackson  
Draw I feel that if I watch carefully I could meet up with a  
cowboy on a horse at any moment, who might be one of the outlaws  
who roamed this way so many years ago.

Sincerely yours,



David and Stacy Ely

RESPONSE TO COMMENT LETTER 101 (ELY)

101-1 Thank you for expressing your concerns. Please refer to our  
responses 12-1 and 53-1.

101-1

5:123

1624 South 1000 West  
Vernal, Utah 84078  
March 23, 1992

Jean Sinclair, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

Dear Ms. Sinclair,

I am very concerned about the resource management plan for Diamond Mountain. Proposals A, B, C and D seem to be loaded to the desires of special interest groups. Short term profits and improper use of fragile land is not in the best interests of the people of Utah. The Federal Government and the State of Utah need to consider the alternative which will best benefit the majority of citizens. This choice should be Alternative E. It is the most sensible management plan. Our fragile desert environment needs to be protected, therefore I must also concur with the Uintah Mountain Club's proposals for the improvement of Alternative E.

Our delicate must be carefully protected, we cannot afford to error in the management of precious natural resources. Please consider the tremendous potential for long term environmental destruction the other proposals would allow. Please adopt E with the changes put forward by the Mountain Club.

Sincerely,



Steve Kreek

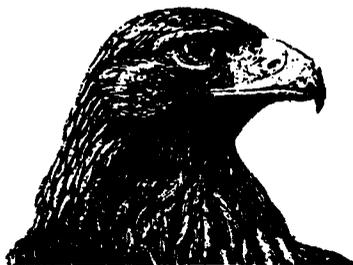
RESPONSE TO COMMENT LETTER 102 (KREEK)

102-1

Thank you for your comments.

102-1

5.124



*Land is an organism. When we see land as a community to which we belong, we may begin to use it with love and respect.*

*There is no other way for land to survive the impact of mechanized man.*

*Aldo Leopold*

**UINTAH MOUNTAIN CLUB** • P.O. Box 782 • Vernal, Utah 84078

March 23, 1992

Team Leader Jean Sinclair  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

Dear Ms. Sinclair,

Let me express my hardy support for the general principles outlined in Alternative E of the Draft Diamond Mountain Resource Management Plan. Alternative E truly goes a long ways towards addressing the competing needs and desires of various interest groups. However, while Alternative E is a bold step in the right direction, there are some weak points which need correction before its adoption as the final RMP. The Natural Resources Committee of the Uintah Mountain Club will be sending you a detailed list of specific wording and paragraph corrections we would like to see. In this letter I wish to highlight some of the more general issues which need to be addressed in the final RMP.

In terms of overall goals, we would like to see the BLM move toward a greater balance between conflicting uses. We need a truly workable multiple-use philosophy, which takes into account both non-consumptive and consumptive uses. Ecological preservation and recreational uses of the land need to have an equal footing with income and employment generation. Multiple-use should mean various, separate lands being set aside for different uses. Quiet and solitude oriented recreation cannot co-exist on the same acreage open to motorcycles and ATV's. Grazing and primitive, backcountry camping do not go well together. It is imperative that the BLM designate and reserve lands to meet the needs of all of the different people wishing to use them.

With the above comments in mind, I ask the BLM to address the inequities expressed in Table 2-2 "Management Priority Areas by Alternative" page 2.16. I do not see much balance between competing land uses when proposals A, C and D call for zero acres of Level 1

RESPONSE TO COMMENT LETTER 103 (UINTAH MOUNTAIN CLUB, Borton)

103-1 Please refer to our response 61-1. Using this concept, an even progression of level acreages between the alternatives and the proposed plan did not develop.

5.125

103-1

103-1  
Cont.

land. Even proposal E with 6,100 acres of Level 1 appears to be an unfair compromise, when compared to the 113,000 acres of Level 1 land called for under B. Even at Level 2 protection levels, proposal E with 9% is not an adequate compromise between the 1% of C and the 42% of B. While many of the specific proposals of plan E are fine, in terms of the overall balance between competing land use philosophies and needs, far too little acreage is sufficiently protected. In terms of Level 1 and 2 Management Priority Areas, I would like to see a compromise between the acreage figures of proposals B and E. Specific areas deserving special protection will be dealt with below, but in terms of the general overall balance of land use options, this question of total acres under level 1 and 2 status needs to be addressed by the BLM. More areas with unique and important non-commercial resources should receive level 1 and 2 management prescriptions. This should include paleontological and archaeological sites, vital wildlife habitat, riparian areas and lands of scenic and recreational importance.

5-126

103-2

Even though Alternative E calls for designation of 5 Areas of Critical Environmental Concern, not enough land is protected. In particular, the slickrock country north of Steinaker deserves protection. Here we have a ten-square-mile section of some of the most scenic country around. This is an excellent area for hiking, photography and other non-motorized forms of recreation. Furthermore the area includes relic vegetative communities and cryptogamic soils in need of protection. In the last two years, the area around Moonshine Arch has suffered vandalism and trashing, while ORVs have extended trails into previously untrailed areas to the detriment of the existing vegetation. Most of this area should be preserved for primitive and semi-primitive, non-motorized recreation. The motorized travel to the Arch should continue to be banned, the ban expanded to the surrounding area, and the ban enforced with ticketing of offenders. The BLM should also acquire adjoining private lands and State Section 16 in the Red Mountain Area so as to better manage and protect the area.

103-3

Other areas in need of attention are the Diamond Break's and West Cold Springs WSAs. Should they not receive wilderness status from Congress, they still deserve to be part of the Brown's Park ACEC. Both the Upper and Lower Green River should be granted Wild and Scenic Status. Equally important is the closing of sage grouse leks and raptor nesting sites to OHV use or other surface-disturbing activities. Maximum protection should be given all threatened, endangered and special status species. The Mountain Club strongly supports all efforts to reintroduce bighorn sheep, river otters and black-footed ferrets. However, we oppose phosphate mining in the Red Mountain / Ashley Creek area as this is critical/crucial winter range for deer and elk. The draft RMP fails to offer any differences in the alternatives offered on this issue. Furthermore, it is important to establish protective zones around archaeological and paleontological sites. Such lands should also restrict ORV and other surface disturbing activities.

103-4

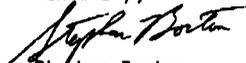
- 103-2 Thank you for your concerns. Please refer to our response 70-1.
- 103-3 Please refer to our response 77-5.
- 103-4 Regarding your concern of phosphate mining in the Dry Fork area, please refer to our response 61-2. We do not believe it is necessary to establish buffer zones around archeological and paleontological sites. We are however expanding Map 3-3 to identify additional sensitive paleontological areas brought to our attention during review of the draft RMP. Refer to Chapter 2 for a comparative description of how these resources will be managed between the proposed plan and the alternatives.

103-5

The only other major problems with the plan I see is the failure to adequately deal with the need for future restrictions on mountain bike use and your labeling of social categories. Mountain bike use is growing rapidly and needs to be addressed. In Chapter 4 your designation of social categories is bothersome. Your terms of "workers" and "young newcomer" seem to distort the facts. Mountain Club members range in age from diapers to retirees. Many were born here, while others have lived here for many years. All hold jobs, many in professional fields, and work very hard in support of their community. Less divisive terms should be found for naming these categories.

We are pleased with the new emphasis the BLM is placing on riparian areas, Wild and Scenic River designation, and the reintroduction of indigenous species. We approve of the BLM commitment to improvement of rangelands, preservation of scenic areas, enhancement of recreational values, protection of wildlife habitat, and the designation of 5 Areas of Critical Environmental Concern. This draft RMP is a grand step forward. Alternative E is a good beginning. With the changes the Mountain Club is proposing it can be a great alternative suitable for meeting the many diverse needs of the community and the land.

Sincerely,



Stephen Borton  
President

103-5

Mountain biking is a legitimate use of public lands. Currently in the Diamond Mountain Resource Area there are no problems identified with this use. It is expected that if problems develop it will be in areas that receive heavy recreation use such as Red Mountain and Browns Park. Mountain biking along with other uses will be addressed when recreation management plans are prepared or revised for these areas. All discussion to the "social categories" have been removed from the proposed plan/final EIS.

Allan J Smith  
Box 153  
Duchesne, Ut 84021

March 24, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Ut 84078

Response to Diamond Mountain Resource Area Resource Management Plan and  
Environmental Impact Statement.

General Comment:

I am a third generation rancher and my family has been using my allotment before and since the inception of the BLM through the Taylor Grazing act of 1934. Any decision by BLM affects my livelihood and the economic base of all the counties of Utah in which I do business.

Under the section "Purpose and need" pg. 1.1 the principal of "Multiple-use is referred to and its principals are to be followed in management. I can concur with this policy in total. This policy of Multiple-use is mandated by law and can not be changed by simple in house policy. The "Memorandum of Understanding" between Ut. Dept of Ag. and the Ut State Director of the BLM signed on 6/21/88 provides for State involvement in this EIS. The Uintah County Commission adopted a similar ordinance incorporating the "MOU" on 11/5/91 and the Duchesne County Commission is considering such an ordinance.

In general these ordinances and "MOU" state that where the economic base and cultural value of its area are affected the Utah Dept of Ag. and County Commissioners must be made a part of any decision making process. Further the public range lands Improvement act of Oct. 25, '78 ensures full participation of the permittee(s) and UDA in the planning process if requested and agreed to by the permittee.

I as a permittee am requesting such permission to participate in any planning process and I am requesting my present and future comments be made a part of the record regarding this DEIS.

I am also asking our Duchesne County Commissioners and Uintah County commissioners to be involved in as much as they are charged by law to protect the economic base of their counties.

Any decision made by the Vernal District BLM that may adversely affect my allotment on the BLM will in turn affect my total operation and in turn affect my tax base that I may provide. I want it noted that the economic multiplier of Agriculture in the State of Utah is between 3 and 4 and is much higher than other industries. For example for every dollar I spend as a rancher is multiplied 3 to 4 times. I spend most of my money in the rural part of Utah and in turn this money helps keep rural Utah alive. Eastern Utah gets most of its revenues from agriculture and oil. These industries must be protected at all costs.

Under "Cumulative Impacts of Implementing Alternative B paragraph # 7 states: Cumulative increased wildlife use from 27,500 AUM's to 40,000 AUM's could result in livestock reductions (9,000 AUM's) which may result in a \$11,500 yearly loss to the local livestock industry. However, this increase may also generate up to \$94,300 for the local community from lodging, food and transportation costs paid by the hunters and recreationists. These figures I challenge.

RESPONSE TO COMMENT LETTER 104 (SMITH)

104-1 Thank you for your comment. Be assured that BLM has seriously sought the input of the State of Utah, Duchesne and Uintah County Commissions, as well as DMRA grazing permittees throughout the development of this RMP. Please refer to the State of Utah's comment letter (114), the Duchesne County Commissioners (36) and Uintah County Commissioners (110) comment letters as well as our specific responses.

104-2 Please refer to our response 69-2.

104-3 The 9,000 AUM reduction was printed in error. We believe livestock preference will be met under the proposed plan. Please refer to our response 52-2.

5.128

104-1

104-2

104-3

There should not be any reduction of livestock Aums in favor of wildlife. Any reductions need to be made on scientific evidence based upon the resources.

104-4 The 31% increase of wildlife can not stand and alternative E must be changed to eliminate this large increase.

This EIS is stating that wildlife Aums are 8.24 times more important than the livestock aums. I can not accept these figures. The \$1.27 value of a livestock Aum is in error and should be \$ about \$9.19. From what expert did the \$94,800 increase come from?

Page 4.65 Table 4-13 Summary  
Alternative C states present levels of Big game at 27,600 Aums. Can the ELM show scientific data to support these figures. My opinion is that the present big game aum levels are now more at the proposed levels in Alternative E, 40,000 Aums.

104-5 The ELM has not sufficient population counts to support their proposals. The ELM has relied upon DWR's population count and I believe DWR's data to be in favor of DWR's whims. I believe more range studies such as we have done in Big Wash Draw are necessary to document forage use by domestic livestock and big game. The pellet counts and utilization studies are the best method to document populations.

I understand big game levels on a Unit wide basis may be in line but some areas are receiving more than their percentage big game usage. This non uniform grazing by big game must be addressed.

5.129

104-6 Page 4.65 of the Summary of Impacts of livestock assignments.  
Alternative A states forage assignments could be given to livestock on a temporary, non-renewable basis until needed by wildlife. This is not my understanding of the present management system. During the 1960's when livestock levels were reduced by permittees it was agreed that any increase of forage would be given 50% to livestock and 50% to wildlife. If this EIS is ever challenged in the court system, I believe that the ELM authors of this DEIS could be held accountable for their miss statements regarding how forage is presently allocated. The 50% allocation needs to be in writing and not hidden from all concerned.

The only way I could live with a new EIS is that alternative E if accepted continue the present formula for forage allocation..

104-7 This is the end of general remarks and I will now address those concerns of mine with my present cattle allotment in the Big Wash Draw. My 5 year average use is low because I have just recently changed from a sheep operation to a cow operation plus the drought of recent years has influenced my running lower numbers than my preference calls for. The statement of page A 2.4 273 wildlife Aums and cow aums of 290 equal 563 present use does not necessarily represent what our pellet and utilization studies show. I believe big game usage show more like 65% of the feed utilized. The ELM office has the actual records and it should show what is actually going on. I can agree at the total aums present (1,332) as stated on page 2.4 but I can not accept a reduction of my preference to accomodate the proposed wildlife objectives

104-4 Please refer to our response 53-3 regarding wildlife and livestock forage allocations, and the socioeconomic assumptions in Chapter 4.

104-5 The 27,600 AUM forage assignment for Alternative C is based on UDWR's annual surveys. We recognize UDWR as the expert on wildlife management within Utah and accept their use levels. We currently have 30 pellet transects in place on crucial areas throughout the resource area and have plans for additional studies. We recognize that both livestock and wildlife prefer certain areas and as a result "nonuniform" grazing occurs throughout the resource area. We have always attempted to even out this use through water developments and forage enhancement project work.

104-6 As part of Table 2-15, under Alternative A, additional AUM distributions to livestock and wildlife are stated in agreement with the decisions in existing planning documents. In the Ashley-Duchesne areas, forage increases would be divided equally between livestock and big game on non-crucial areas. If this forage were not needed by big game, it would be given to livestock.

104-7 Monitoring studies on Big Wash Draw Allotment indicate a total of 1,141 AUMs are presently available to livestock and wildlife, refer to Table A2-1, in Appendix 2. Currently, there appears to be sufficient AUMs on the allotment to accommodate existing livestock preference and objective levels for wildlife.

104-8

The population of elk using Big Wash Draw allotment is now much higher than this BLM DEIS statement is now showing.. I believe that the objective wildlife level is already now achieved. We can not accept DWR's count only but must use all of our tools available. The DWR has used the Elk Management Plan which has been in the process for at least 10 years to achieve its desired elk levels. While this plan has been in development the elk numbers have increased by leaps and bounds. Just because the whole elk unit may not be at DWR's desired level is not a concern of mine but if Big Wash Draw allotment is at its objective level then any future increase of wildlife will have to be dealt with by me, BLM and DWR.

104-9

As for the 82 Aums gained for wildlife I have the following comments:  
First the contour disk and seeding this past fall of 1991 in Big Wash Draw is not an increase of aums but it simply replaces what was done in the early 1960's. The old seeding project quit providing the quality of forage it used too. I believe the main reason was the flood action silted over the seeded land, thus stopping water infiltration and normal plant growth.

Secondly, Steve Strong, BLM range Con. I contacted me last year and asked if I would contribute seed to the proposed seeding project in Big Wash. I stated I would if DWR would also contribute some seed. I WAS NOT TOLD THAT any future increase in Aums would go solely to wildlife. This DEIS has been in the process for quite a long time. It is my contention that my contribution of some 400 lb. of seed at a cost to be of \$1,000 was received by the BLM under false pretences. Either I receive half of the increase from this seeding project if it is actually an increase or I receive half of the benefits if it simply replaces what was one there. The proposed DEIS is not yet final and we must allocate forage under the present system of 50% for livestock and 50% for wildlife.

104-10

I have in the past objected to BLM personnel both in writing and verbally that I oppose BLM's policy of creating a year around habitat for elk of this BLM range by making water ponds for wildlife. The Big Wash Draw is a winter range. BLM must be held accountable for its creation of watering ponds. I can not agree that these ponds are only for erosion control. After one or two years from now if the four ponds made in the fall of '91 are not filled up with sediment I will ask the BLM to fill them. This range can not tolerate elk using it all though the growing season, of March through June. My cows leave this allotment the first of March thus allowing for new growth to become established.

104-11

I appreciate BLM and DWR personnel working with me on the Big Wash Draw allotment. We should continue to work together and have constructive dialogue. I intend to be a good steward of the range so that my future use of this range will continue. Protection of the range resources should be the number 1 goal of all of us. I have reduced my livestock numbers in drought years and I am willing to continue to work for better range conditions.

Sincerely



Allan E Smith

104-8

In 1986 we established pellet group transects in cooperation and coordination with you and UDWR as a means of monitoring livestock and wildlife use. We continue to monitor the utilization on vegetation and will use this data as the key factor in determining eventual stocking levels. Vegetation improvement work also continues on the Big Wash allotment with 150 acres of old grass seedings replanted in 1991 and 400 acres of pinyon and juniper trees planned for firewood harvest in the future (refer to Appendix 8). The Anthro-Argyle elk herd management plan will be scheduled for completion in 1994 in accordance with State of Utah priorities. We look forward to working with you and UDWR to resolve objective and wildlife-livestock concerns.

104-9

The RMP was not in effect when the plowing and seeding project was completed in 1991 on Big Wash Draw Allotment. The project was completed, as you indicated, to improve existing production to post-treatment productivity, or in other words, to maintain the project viability providing forage for livestock and wildlife. UDWR contributed half the seed to provide for increasing elk use in the area. Until the proposed RMP is approved, any increases in forage will be allocated under the direction of the current planning document.

104-10

Please refer to our response 104-8 above. We believe with normal precipitation some spring elk use on the grass is not detrimental. Our management objectives have been to increase forage production for both livestock and wildlife through habitat improvement projects and to improve elk distribution by developing new water sources. The data collected to date indicate that these objectives are viable under good range management principles.

104-11

Thank you for your comment.

P O Box 6306  
USAPA CO 80841-6306  
March 23, 1992

Jean Sinclear  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal UT 84078

Regarding: Diamond Mountain Resource Area Resource Management  
Plan and Environmental Impact Statement

Alternative of Choice: Alternative C Forage Production with  
limitations.

I am opposed to the development of any roads or campgrounds in  
the Mamé's Hole - Bear Hollow area. There is not a road into  
this area and it should be left that way. We need to have some  
areas of this country left untouched by the hand of man. Roads  
will destroy the natural habitat of the wildlife and animals that  
live in those mountain meadow environments.

Sincerely,



Cadet Daniel J. Ely  
United States Air Force Academy

RESPONSE TO COMMENT LETTER 105 (ELY)

105-1 Thank you for expressing your concerns. Please refer to our  
responses 12-1 and 53-1.

5.131

105-1

A. Rex Gardner  
18402 Augusta Drive  
Monument, CO 80132  
March 25, 1992

Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

ATTN: Penelope Smalley  
Team Leader

RE: Diamond Mountain Resource  
Area - Resource Management  
Plan and Environmental  
Impact Statement

Dear Ms. Smalley:

Recently it was brought to my attention that your office, United States Department of the Interior Bureau of Land Management, November, 1991, released for public comment a detailed report in a large book, Diamond Mountain Resources Area RMP/EIS (Draft).

After obtaining a copy of your above mentioned report and a serious attempt to comprehend the purpose and intent, referenced, (acquire needed public vehicle access for recreational purposes).

I am submitting my comments from Florida and I do not have my records with me for exact dates and in the essence of time I shall make my statements with dates approximately.

In the 70's, Alvin Kay, Glenn Cooper, and myself purchased 5,149 acres of Fee property called the Warren Draw, and purchased under the name of Gardner, Cooper, and Kay, G.C.K., and shortly after the purchase we, G.C.K. was contacted by the Department of Wildlife Resources and B.L.M., to sell the G.C.K. properties to replace deprived wildlife habitat that was taken by the building of Flaming Gorge Dam. G.C.K. agreed to sell only 2,400 acres and Alvin Kay and myself decided to keep the North 1600 approximately acres and continue to use in conjunction with B.L.M. and State of Utah grazing A.U.M's.

The 2,400 acres became a public use area and the old original Patented Properties Cabins, fences, and corrals have been burned by deer hunters and four wheel drive vehicles have roade where they should not be; the deer and elk are scarcely seen in these areas now.

To: Penelope Smalley  
From: A. Rex Gardner  
Date: March 25, 1992  
Page two

The remaining 1,600 acres is unique, in that the only way to continue access to the North end of the Warren Draw would be to cut a road in the center of the long sliver of private property, seriously dividing the grazing and requiring fencing. After public access is acquired by this approach, it would only accommodate a short distance and a turn-around for the North and has a steep drop to the Green River below.

There is no public fishing in the Warren Draw and the public is now not deprived of foot traffic or horseback hunting and I see no point in destroying our privacy of our existing cabin and grazing for this small distance to accommodate a road that cannot be used for any purpose other than a turn-around.

I am not in favor of this invasion of additional access for public use in the area of i.e., Warren Draw, Jackson Draw, Lambson Draw, and Ashley Creek. Ranchers are struggling to survive as is, and wildlife is also being threatened by this proposal.

Sincerely,



A. Rex Gardner

RESPONSE TO COMMENT LETTER 106 (GARDNER)

106-1

Please refer to our response 12-1.

106-1

5.133

March 28, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

To Whom It May Concern:

As the livestock permittee on the Bridgeport allotment, we appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Diamond Mountain Resource Area Resource Management Plan. Our season of use on this allotment is April 11 - May 15. For the past 15 years with the agreement of Bureau of Land Management we have grazed more numbers with a shorter season of use. This is actually a better grazing system for the vegetation, due to better distribution throughout the allotment with light use occurring on the majority of the allotment. We are out of the allotment early enough in the growing season to allow vegetation to achieve significant growth and set seed. This leaves more vegetation for wildlife use in winter.

We have been working with the Soil Conservation Service to improve our private land. It seems contradictory that one government agency wants to see improvement to help the livestock industry and another wants to hinder it's very existence.

We agree with your comments that high overhead costs and taxes have caused several ranchers to sell, and nontraditional owners buy these properties. It would seem to be of value to all involved for you to support the traditional ranchers who are very

RESPONSE TO COMMENT LETTER 107 (RADOSEVICH)

107-1 Thank you for your comment. BLM also believes there are great benefits to ranchers and wildlife managers working together to achieve resource goals while maintaining or improving the quality of life.

5.134

107-1

107-1

much aware of the lands around them and know they can not abuse these lands and still make a living. Also most traditional ranchers we know enjoy seeing wildlife, and would do all they could to help improve wildlife habitat, to help compensate for the amount of forage that wildlife consume on their private property. The only time ranchers don't enjoy seeing wildlife is when they are consuming valuable forage and the rancher is not being compensated for this loss. We can see benefits to ranchers and wildlife managers in working together to preserve both our way of life and the wildlife habitat.

The following comments pertain to the Browns Park area and the Bridgeport allotment, since management changes in this area would affect us.

Wildlife

5.135

107-2

What about impacts by wildlife to the private land owner? According to our counts this past year, on our private ground, there was in excess of 300 head of deer, 60 head of elk, 15 head of antelope and uncountable numbers of geese.

107-3

In reference to statement A8.18 #3, if this statement is true, then wildlife numbers should not be increased. If the forage can not support an increase, then you can't put it there. We feel there is little or no conflict for vegetation between deer and livestock the time of the year that livestock are grazed on the Bridgeport allotment. Studies have shown that most competition between deer and livestock is behavioral and occurs when competing for forage on summer ranges. (John G. Kie ETAL.USFS,Pacific South West Research Station) We are not trying

107-2

Please refer to our response 12-2.

107-3

In the draft RMP, Bridgeport was shown as having a forage availability problem in error. Table A8-3 has been corrected accordingly. You are correct, if the forage cannot support an increase in use, BLM will not advocate an increase. We agree, spring livestock grazing in Browns Park is beneficial to maintain deer winter range.

107-3  
Cont.

to discourage wildlife, just the exclusion of livestock. According to a recent study by Richard Decker and David Pyke, of Utah State University, cattle grazing can be beneficial to sagebrush growth, which supports the deer herds in Browns Park in the winter. There is no competition between livestock and deer for this winter forage.

Any range improvements made would be beneficial to wildlife and livestock and should be encouraged. We are willing to improve our allotment and have offered to use our equipment, fuel and labor to pull a rangeland drill to improve forage.

Table A2-1 talks of increasing antelope use by 5 AUMS, elk by 92 AUMS, moose by 5 AUMS and bighorn sheep by 25 AUMS. It seems that Division of Wildlife Resources can not manage the current number of wildlife efficiently, we feel the numbers they have counted for this area are low. Increasing wildlife by these amounts would directly impact our private land. We don't support an increase of wildlife numbers in the Brown's Park area, due to the above reasons. We also feel the vegetation in this area should not be asked to support such an increase. If the wildlife increase is necessary, we hope the increase would not occur until sufficient forage has been established, in order to decrease impacts by wildlife on government and private ground due to such events as a drought and other natural occurrences.

#### Riparian

107-5

The riparian on the north side of the river, Bridgeport allotment, where there is cattle grazing early in the spring, are in better health than the other side of the river. There are

107-4 We agree with your concern for sufficient forage to support objective levels of wildlife as requested by UDWR. Appendix 2 footnotes this objective stocking level request according to the condition of the habitat. We have identified approximately 300 acres of pinyon and juniper woodlands on Bridgeport allotment as a possible treatment area (refer to Appendix 8). Such improvements would be programmed and executed over the life of the RMP to coincide with anticipated wildlife increases. Vegetation monitoring would determine if objective levels could be met once all improvements are complete.

107-5 The conflict with spring cattle grazing on the Green River through Browns Park is largely with recreationists, not riparian vegetation. Cattle grazing is incompatible along this river during high intensity fishing and float boating periods. We agree, some grazing systems are used as a method of maintaining or improving riparian areas.

107-5  
Cont.

more willows and vegetation on the north side of the river.

Grazing systems can be managed to improve or maintain riparian areas, without the exclusion of livestock.

Impacts by livestock on the riparian area of the Bridgeport allotment are considerably less than recreation impacts in this same area. Impacts by recreationists, include litter, human waste, and compaction of soil by vehicle and foot travel. More sanitation and litter facilities should be provided in the Browns Park area. A recreationist lighting his toilet paper on fire near our private ground below the lower Swallow canyon boat ramp, started a grass fire. He left and we had to fight the fire to keep it from burning onto our private land. As recreationist in this area increase, we are sure this type of incident will become more frequent.

The impact statement suggests fencing the corridor of the green river to prevent livestock impacts. Recreationist do not respect fences and we are not so sure they would consider fences very scenic. Gates would most likely be left open allowing livestock access to the river and cause more problems in the long run. Cost of fencing and cattle guards (if these would be put in, instead of gates) on each access road to the river would be enormous. Who would be responsible for the cost of fencing the corridor and maintaining the fence after it is in place?

107-7

Where are the studies that show the riparian on the Bridgeport allotment to impacted? Table AB-2 shows the condition of the riparian along the Green River in Browns Park to be in mid condition in 1990. What stage was this area in previously, is it

107-6 Much of the river corridor has already been fenced. The only area currently not fenced (and is planned for fencing) is on the north side of the river, near the pipeline crossing at the head of Little Swallow Canyon and at Little Hole, where Davenport Creek enters the Green River. BLM and/or other cooperators would fund and maintain needed fencing to control livestock grazing on the Green River. We agree that at times gates are inadvertently left open, allowing access to the corridor by livestock, therefore cattle guards would most likely be used in highly used access areas to the river.

107-7 A riparian inventory was done in 1990. Photo points and an ocular assessment of condition was conducted along the Green River through the Bridgeport Allotment. We have no record of riparian condition of this area before the inventory was done. We agree, in most cases, one year's worth of monitoring is not sufficient to determine trend. Your grazing license extends to May 30, which is well within the high use period of float boaters and fishermen for this area.

5.137

107-7  
Cont.

improving or degrading? One years worth of monitoring is not sufficient to determine what is happening on the ground. Could this mid condition rating be enough on the most productive stage for wildlife habitat and livestock grazing?

The time of year that we graze this allotment is before the tourist season begins and conflicts between cattle and recreationist would be minimal and visual quality would not be a significant issue.

#### Economics

When this EIS talks of tourist money going into the local economy, what is considered the local economy? A lot of the people that visit this area, are just passing through and don't purchase anything locally, a lot of the recreationists come here in self contained campers that they furnished in Salt Lake or Denver, we wouldn't call this local. A majority of the fishermen in the Browns Park area just come here for one day and they bring everything they need. They are not putting any tourist dollars into the local economy. What about the \$300,000 we put back into the local economy every year. As one larger land owners in Daggett County, we know any impact to us would also impact the local economy.

We feel the economics in the EIS need some rethinking. The economic value for a recreation visitor day of \$25 is just a value and there is nothing showing how this figure was derived. We also feel your values of \$9.19/ AUM is too low as it relates to permittees.

107-8

Please refer to our response 3-24.

5.138

107-8

Wild and Scenic River

107-9

We do not support having the Green River become a wild and scenic river. We feel it does not qualify for anything but a recreation river. The Flaming Gorge Dam seems to prevent the river from being free flowing, which is one of the main criteria for consideration as a wild and scenic river. There are several diversions already in place, for the Browns Park Waterfowl management area, pumps for the two ranching interests, not to mention the five areas used as boat ramps. The only area that could possibly qualify would be from the dam to Indian crossing boat ramp.

5.139

107-10

We definitely would not be willing to sell our land along the corridor, due to the fact that is where one-third of our hay production for our operation comes from. We also are not receptive to the restrictions that apply to Wild and Scenic rivers. Our land on the river is very productive portion of land that supports part of our operation not to mention the large number of geese, deer and elk also found here. We are sure you would not appreciate the Federal Government telling you what you may do to improve your yards. We have seen how the Division of Wildlife Resources has let their refuge land for waterfowl turn to a noxious weed patch. We feel it is better to have that land in production for us and the wildlife, than to just add to the already enormous noxious weed problem along the Green River.

107-11

In closing, has your monitoring shown significant change in resource management and/or condition to reclassify Bridgeport as

107-9

We reconsidered our original recommendation to designate the Green River for inclusion as a scenic river in the National Wild and Scenic River System. We still concur with this recommendation. Any opposition will be considered by the Secretary of the Interior and Congress prior to a final designation. The concerns you have about intrusions into the river corridor affecting the river's eligibility and classification were discussed in the original wild and scenic river study completed in 1980. At that time it was determined that the river should be recommended for designation as a scenic river in the Wild and Scenic River System.

107-10

Thank you for expressing your concerns. Any land acquisitions undertaken by BLM in support of the upper Green River's W&SR recommendation would be from willing sellers or givers should the opportunity to acquire such lands arise. The management prescriptions for the Green River Corridor in Browns Park would affect only public lands managed by BLM.

107-11

The Bridgeport Allotment is proposed to be an "I" category allotment due to high potential for improving wildlife habitat, not due to unsatisfactory range conditions. We appreciate your desire to be involved in the decision making process and in the monitoring of your allotment. We will continue to give you the opportunity for maximum involvement.

an "I" allotment, instead of an "M" allotment and how will this affect our management? We would like to remain involved in the decisions made about management of our allotment, and would like to participate in any monitoring you do in the future. We know our rangelands are a valuable resource and we want to do our best to keep them in a condition we can be proud of. We feel this EIS is very biased towards wildlife and is not taking a multiple use approach.

107-11  
Cont.

Sincerely,

  
Alex Radosevich

President, Willow Creek Land and Livestock, Inc.

108-1

Thank you for your comments. Please refer to our response 79-2.

March 28, 1992

Re: BLM Resource Management Plans

Dear Mr. Smalley:

Please restrict the Red Mountain area north of Vernal in your upcoming BLM Resource Management Plans. As you know, this is the mid range mountain of the whole area. Motorcycles should not be allowed to ride all over it. Please support the Mountaintop Club's position; i.e., Alternative E with modifications.

I'm specifically concerned that Red Mountain get semi-primitive non-motorized status and Level I management for the area from the top down & including the area from Mountain Arch to the Rocky Overlook on the west side.

I support & prefer Alternative B but at the very least Alternative E with the Mountaintop Club's modification proposals.

Sincerely

Kath L. Wake

51 E 2050 N

Provo, Utah 84604

375-5519

108-1

5.141

U.S. Diversified Group  
600 Grant Street  
Pittsburgh, PA 15219-4776  
412 433 4670  
Telex 86 8425

Resource Management

Donald R. Saxauer  
General Manager



March 26, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South, 500 East  
Vernal, Utah 84078

Diamond Mountain Resource Area (DMRA)  
Environmental Impact Statement

Dear Ms. Smalley:

After a review of the subject DMRA document we would like to comment on its relationship to our future phosphate development area. This contiguous property block is 8,751 acres situate in Township 2 South, Ranges 22 & 23 East consisting of three federal phosphate leases (7,472 acres), one state phosphate lease (1,157 acres), and fee land (122 acres).

109-1 The description of this future phosphate operation is accurately covered in Chapter 4 - Assumptions, page 4.8. The portrayed impacts and the environmental controls which would be associated with the underground mining and surface milling operations appear realistic and are consistent with our current plans.

109-2 In Chapter 3 - Affected Environment, page 3.32, the Phosphate section mentions 4,000 acres under federal lease rather than the 7,472 acres which we control. The companion Map 3-14 does not show the KPLA extending into Township 2 South, Range 23 East as would be consistent with our leases.

For the various alternatives in the DMRA we would offer the following comments:

109-3 Alternative A - As stated on page 4.19, our phosphate lands would be open to development with restrictions to minimize adverse impact to deer winter habitat. Development of these reserves could add 350 jobs and \$4,000,000 annually to the local economy.

RESPONSE TO COMMENT LETTER 109 (U.S. DIVERSIFIED GROUP, Saxauer)

109-1 Thank you for your comment. It is helpful to know our assumptions, outlined in Chapter 4, are realistic and consistent with your plans.

109-2 We have modified our figures in the proposed plan describing the number of acres under lease by USX.

109-3 Your assessment of the affect of Alternatives A and D upon USX leases is correct.

5.142

**US**

**Diversified  
Group**

109-4

Alternative B - This alternative would effectively prevent development of phosphate reserves as stated on page 4.29, due to obscure wildlife considerations. Your statement in Chapter 1 - Minerals Management , page 1.11 appears to ameliorate these restrictions. It is stated that "Areas under existing leases will be managed in accordance with the stipulation attached to the existing lease". While "... additional restrictions could be applied to protect critical resource values ...", "These additional restrictions would not preclude the existing lease rights".

109-5

Alternative C - This appears to be concerned with impacts to cultural and paleontological resources. While there is no mention of phosphate lease lands listed under this alternative, we believe underground mining would not have an adverse impact.

109-6

Alternative D - Similar comments to Alternative A on phosphate lands.

5.143

109-7

Alternative E - Similar comments to Alternative A on phosphate lands with one exception. Designation of the Southeast quadrant of Township 2 South, Range 22 East as an ACEC could adversely impact development of the phosphate reserves since there is some overlap with planned surface facilities.

We appreciate this opportunity to review the draft DRMA.

Thank you for your interest and consideration to our comments. Would you please include us on your mailing list for the final EIS.

Yours very truly,



Donald R. Sexauer

cc: Richard F. Riordan, Consultant  
Sandy, Utah

109-4 The restrictions under Alternative B would be imposed only at the time of lease renewal.

109-5 The lack of comment about phosphate in Alternative C reflects the fact that we did not believe there would be any impacts to phosphate under this alternative.

109-6 Please refer to our comment 109-3 above.

109-7 It is unlikely that ACEC designation would impact USX leases. No additional restrictions are imposed within the bounds of the ACEC that are not imposed outside. At the time of actual lease development or lease renewal, restrictions would be developed only after site specific analysis and mine plan adjustments.



# UINTAH COUNTY

STATE OF UTAH

*Our past is the nation's future.*

COMMISSIONERS:  
Max G. Adams  
Lynn F. Merrill  
H. Glen McKee  
ASSESSOR - Lorin T. Munkley  
ATTORNEY - Harry H. Souvell  
CLERK/AUDITOR - Paul S. McVieil  
RECORDER - Randy J. Simmons  
TREASURER - Donna Richens  
SHERIFF - Lloyd D. Meachern  
SURVEYOR - Nelson J. Marshall

DATE: March 26, 1992

TO: Penelope Smalley and Jean Nitschke-Sinclair,  
Team Leaders  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078

FROM: The Uintah County Commission

RE: Diamond Mountain RMP

Uintah County is requesting the BLM to consider Alternative A, for the following reasons:

First, we recognize that the DMR Area is a very large and complex resource area. Coordination and cooperation will inevitably be needed to finish an acceptable draft. We also recognize that some team members who worked on the DMRA and EIS drafts are not native to this area and are susceptible to making mistakes. We hope these mistakes, calculation errors, etc., and personal opinions are not part of the final Alternative Draft for submittal to the Director.

110-1

Some time ago, Uintah County suggested that the Uintah County Extension Agent form a committee and respond with any concerns relative to the livestock industry. This resulted in a letter to you from the Diamond Mountain Permittees and Other Concerned Individuals. We concur with the response from that committee. Please find attached, a copy of this letter, also signed by the Uintah County Commission.

110-2

43 CFR § 1610.3-1 (d) states "A notice of intent to prepare, amend, or revise a resource management plan shall be submitted, consistent with State procedures for coordination of Federal activities, for circulation among State agencies. This notice shall also be submitted to Federal agencies, the heads of county boards, (and) other local government units."

Also, referring to Chapter 5, Consultation and Coordination, page 5.1, third paragraph, "Initial steps in the process began in 1988, with the development of a preparation plan. Other early efforts included research, inventory, analysis, and interagency coordination." Further, also on page 5.1, under the heading of Consistency, paragraph 1, "Coordination with other agencies and

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Chapter 5 - Coordination and Consultation

## RESPONSE TO COMMENT LETTER 110 (UINTAH COUNTY COMMISSION, McKee, Merrell, Adams)

110-1 We are in receipt of the Diamond Mountain Permittees and Other Concerned Individuals' letter (comment letter #226). Both the Uintah County and Daggett Soil Conservation District submitted copies of the permittees' letter with their own individual comments. Please refer to our specific responses to the Diamond Mountain permittees' letter as requested by the Daggett Soil Conservation District (comment letter #179).

110-2 We believe we are in compliance with the regulations regarding public scoping and involvement and have made every reasonable effort to involve Uintah County in the preparation of this plan. At the onset of the RMP process, several public scoping meetings were held to identify issues and discuss the then-upcoming plan. A scoping meeting was specifically held on November 2, 1988. It was stressed at this meeting (and at every opportunity) that at any time the public, including county officials, was encouraged to contact the BLM to express their concerns and/or offer suggestions. In September 1989, planning issues and criteria, developed after input from the public scoping meetings were mailed. In September 1990, members of the Uintah County Commission were invited to attend a two-day briefing and tour for the Governor's Resource Development Conservation Committee to familiarize them with the issues and scope of the RMP. An update report was mailed to all interested individuals and organizations in January 1991. This report briefly outlined the alternatives under consideration. Again county commissioners of Uintah County were provided information and the opportunity to respond. The draft document was released for public review and comment in January 1992. An open house on the draft RMP was held on January 29, 1992, in Vernal to assist the public in their review of the draft document. Team members have made numerous contacts with the county commissioners during the scoping and alternative development stages. In addition one of the commissioners has been on the Vernal District Advisory Council throughout the process, and therefore had numerous opportunities to become involved.

consistency with other plans were accomplished through frequent communications and cooperation efforts between the BLM and involved federal, state, and local agencies and organizations." And, in paragraph 2, "The RMP team reviewed the land use plans for Daggett, Duchesne, and Uintah Counties to ensure consistency. BLM personnel have met with the respective county planners and commissioners to promote greater understanding of goals, objectives, and resources of both the counties and the BLM."

Chapter 1, page 1.14, "The Planning Process", reviews "Action Steps In The Planning Process". Step 1 states that Issues and Management Concerns will be identified. This is intended to expose concerns, conflicts, or opportunities which can be resolved through the planning process. "The BLM managers and specialists from the Diamond Mountain Resource Area and Vernal District staffs held several scoping meetings in November, 1989. The public, other federal agencies, and state and local governments were asked to participate in this scoping process. Information from these sources was combined by BLM into three broad land-use planning issues appropriate for resolution in the RMP/EIS planning process."

According to the Federal Statutes quoted, the initial contacts by your agency with the Uintah County Commission should have begun in 1988. The BLM should have met with the county, one on one, and explained what the resource area consists of, how many anticipated alternatives would be considered, and possible conflicts, concerns or opportunities that might exist. Such contacts would have discovered existing county plans and policies which could have been considered.

The present County Governmental Administration (Commission) is not the same administration that existed in 1988 and 1989. Therefore, the Uintah County Commission hereby notifies you that we do not agree that you have complied with the regulations and statutes with regard to our involvement in the planning stages which have been quoted in this letter, and in your draft document. We respectfully request that any reference to "local government", "county government", "county commission", "county agency or departments", "county planner", or other terms which would refer to Uintah County, including but not limited to Chapter 5, Consultation and Coordination, be withdrawn from the document.

The Uintah County Commission was essentially left out of the early planning process which eliminated our input regarding social, economic, cultural and custom data, as suggested in Chapter 5, Consistency, paragraph 2. Team leaders may not have intentionally neglected to solicit our input, however, they must be responsible for this oversight.

Uintah County is asking the BLM to consider our issues and position as stated in the Uintah County Interim Land Use Policy, adopted October 1, 1991.

110-3

To the extent the Uintah County Interim Land Use Policy is consistent with federal regulations, we will naturally adhere to the county's policy. In those instances where the policy outlines adherence to state or local laws and ordinances contrary to federal directives, we would have to arrive at some common understanding. Be assured that we will continue to consult and coordinate closely with the county on matters that may/will involve the county or its residents.

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Under the general comments section of the attached letter from the Diamond Mountain Permittees, etal, we wish to make additional comment regarding the economic impact of the \$54,000,000 annual revenue generated in the three county area from livestock and livestock products. There is no evidence to substantiate that people from outside the Uintah Basin will offset the annual loss in revenue from reductions in AUM's or general ranching operations. Ranching and agriculture are the major economic cornerstones of local community stability.

From this point, we will address specific sections of the draft and our concerns:

Section: Chapter 1 Purpose and Need

Page 1.17 Step 2 - Original criteria were developed in early 1990, and sent to interested parties.

Page 1.17 Step 3 - Collection of various kinds of data. During this phase, special status plant species were inventoried during the summer of 1989.

Why was step 3 done prior to step 2 ?

Neither the present County Commission or the County Public Lands Representative were aware of any DMRA planning effort until some time during Step 5, in mid-summer, 1990. The preferred Alternative E, was not specifically discussed with the County before it was selected.

On July 10th, 1991, a second notice was sent to team leader Smalley requesting a copy of maps or material relating to Alternative E. Was the material available at that time? Attached is a copy of the second letter of request.

Chapter 2 - Common Management, Riparian Management

Page 2.10 It states that on January 22, 1987, BLM issued its national riparian area management policy which defined the term riparian area, set management objectives, and outlined specific policy direction. This policy should not be subject to the liberal extended definition as given on page A6.1, titled Utah State Office Policy, Riparian Area Management Policy, IM UT 87-261 Revised, February 28, 1988. The Utah definition, in our opinion, goes far beyond the National BLM Director's original definition and intent.

Reintroduction of Black Footed Ferret

We would prefer that introduction or reintroduction of the Black Footed Ferret be eliminated from the document. We have no satisfactory evidence that this mammal ever inhabited Uintah

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2.

Thank you for your comments. Please refer to our response 104-2.

110-5

Again, please refer to our response 110-2. We have consulted with and encouraged participation by the county commissioners at the outset and through out this planning project. We believe we have complied with BLM's established procedures and in the established order for completion of a major planning document such as an RMP.

110-6

The Utah State BLM Riparian Policy is an extension of the National BLM Policy and describes guidelines to further the national policy statements including initiating management to maintain, restore, or improve riparian values.

110-7

Documentation that the black-footed ferret inhabited Uintah County has been shown in the Black-footed Ferret Recovery Plan (USF&WS, 1988, p. 7) and the Draft Black-footed Ferret Reintroduction and Management Plan for the Coyote Basin, Utah Complex (USF&WS, 1991, p. 5). It is BLM's opinion that this is satisfactory evidence presented by USF&WS and UDWR that black-footed ferrets have indeed inhabited Uintah County. Prior to any reintroduction, a site specific plan will be prepared with the assistance of a local committee representing all affected interests.

110-7 Cont. County. At some point, with the existence of the Ferret, an EIS would be required prior to any improvements, sowing of new vegetative habitat, or improving range or ranches in general. We prefer that this not be a part of the agenda for the Diamond Mountain Resource Management Plan.

Chapter 4 - Assumptions

110-8 Page 4.5 It states that for the life of the plan, the price of oil will equal \$20 per barrel, and the price of gas will be \$1.50 per thousand cubic feet. Future demands are certainly going to place these prices at higher levels than have been assumed in the draft document. We feel these figures are underestimated.

110-9 Page 4.16 It states under "From Management Actions for Special Emphasis Areas" that not designating Nine Mile Canyon, Red Mountain-Dry Fork or Browns Park Complexes as ACEC's would make it more difficult to stabilize and protect the important cultural resources within these areas because they would not receive the management priority consideration afforded an ACEC. We disagree with this thinking. These were nominations by the Nature Conservancy and the Uintah Mountain Club, and are not necessarily worthy of being granted special management consideration. Do the opinions of these two environmental groups merit the extension of additional ACEC's?

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110-10 Page 4.17 "From Management Actions for Livestock Programs", states that it is intended to eliminate domestic sheep grazing within 10 miles of identified Big Horn Sheep reintroduction areas. Again, we concur with the comments given by the Diamond Mountain Permittees findings, that the 10 mile buffer is not defensible.

110-11 Alternatives A and E, have distinctly different land areas in Level 1 through 4. Future oil, gas and mineral inventories are presently unknown and we cannot place more restrictive levels of management on these areas that could contribute to the future economic welfare of the Uintah Basin. For an example, are there valuable trace minerals, uranium, or deep overthrusts of hydrocarbon reservoirs that are presently undiscovered? It wasn't until the late 1970's that the overthrust major hydrocarbon reservoirs were discovered in Uinta County, Wyoming, just North of the Diamond Mountain Resource Area.

110-11 Uintah County would like some language inserted in the proposed final draft to state that if any future unknown resources or reserves (hydrocarbon minerals or otherwise), are discovered within the DMRA, that local government be included with other appropriate agencies to make necessary amendments to the plan to accommodate the development if deemed economical.

110-12 Mineral leasing is incompatible within approximately 65% of the lands in the Red Mountain-Dryfork complex. The entire area is

110-8 We agree that the price of oil and gas may fluctuate over the next 15 years and demand may increase. However, for analysis purposes, the current oil and gas prices were used. Should the price of oil and gas significantly change, the economic impacts to oil and gas companies would also increase significantly as would the benefits from production.

110-9 ACECs may be nominated by anyone. Justification for an ACEC and supporting documentation must be submitted to BLM for consideration. The Nature Conservancy, Uintah Mountain Club and the Utah Chapter of the Archaeological Society each nominated and supplied supporting documentation for their areas of concern. During the development of the RMP these nominations were analyzed and if found to be compatible with the overall management objective for one or more of the alternatives developed, they were included in that alternative.

110-10 There are numerous studies recommending a buffer between domestic and wild sheep. At the outset of this planning project, we identified a need to know which recommended buffer size, if any, would be appropriate for the specific topographic situations within the Basin. At that time no bureau guidelines were available. A committee of local experts was formed, with representatives from UDWR, CDOW, USFS, NPS, BLM and local veterinarians. A buffer up to 10 miles was recommended by this committee to account for the Basin's unique topographic features while minimizing the possible threat of disease transmission between both sheep species from common water and gathering facilities and direct species contacts. The wording of the proposed plan, involving opportunities to create this buffer through negotiations with the involved permittee(s), allows us the greatest management flexibility for each potential reintroduction site.

As a point of historical accuracy, the Bureau did issue draft guidelines (under Instruction Memorandum No. 92-239) which recommends a 9-mile buffer. This guidance was issued after the draft RMP was released for public comment. We sought clarification from our Washington office as to which buffer guideline to propose. Based on this consultation, it was determined that a 1 mile difference in buffer zones would not be significant, again with the condition that negotiations would be used prior to any final reintroductions. This documentation as to the rationale for the proposed plan has been added to Chapter 3. Please also refer to our responses 116-8 and 179-39.

110-11 Should significant mineral resources be discovered in the resource area which require a plan amendment, the Uintah County and other appropriate agencies would be involved.

110-12 Please refer to our response 61-2.

110-12  
Cont.

mapped on page 2.111, map 2-7, of the Draft EIS. The map should be amended to include only the areas West of Highway 191. This is consistent with the 1000+ signatures relative to this issue. All alternatives should recommend withdrawal of mineral leasing for this area at the expiration of the current lease period. A reassessment of management levels for this special management area needs to be done.

In summary, we strongly encourage you to consider our concerns, these recommendations and potential conflicts. The impact of the DMRMP has an important influence on the local economy, and quality of our present and future customs, culture and community stability.

Sincerely Yours,



H. Glen McKee

Lojin F. Mergell



Max D. Adams  
UINTAH COUNTY COMMISSION

UCC:dc  
enclosures  
cc: Jim Parker

5.148



# QUESTAR PIPELINE COMPANY

79 SOUTH STATE STREET • P. O. BOX 11460 • SALT LAKE CITY, UTAH 84147 • PHONE (801) 530-2511

March 26, 1992

TIMOTHY B. BLACKHAM  
DIRECTOR, PROPERTY AND  
RIGHTS OF WAY DEPARTMENT

*Ms. Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Utah 84078*

**Subject:** *Comments on Diamond Mountain Resource Area - Draft Resource Management Plan and Environmental Impact Statement.*

**Dear Ms. Smalley:**

*Questar Pipeline Company (Questar) is an interstate natural gas pipeline company that operates gathering, transmission and storage pipeline and related facilities in Colorado, Utah and Wyoming. Questar operates over 2,400 miles of pipelines within the Rocky Mountain area. Our company provides Uinta Basin producers with gathering, transportation and storage services and with access to customers, markets and other pipeline companies within the region.*

*Questar's pipeline facilities within Daggett, Duchene and Uintah Counties presently have an assessed valuation of \$72,600,000. During 1991, Questar's property taxes to these counties totaled \$714,400.*

*As such, Questar has a sizable facility and operating investment within the Diamond Mountain Resource Area, and appreciates the opportunity to provide comments on the draft Resource Management Plan and Environmental Impact Statement (RMP/EIS).*

**1. Oil and Gas Management Categories:**

*The RMP/EIS recommended management plan (Alternate E) provides for a mix of management actions allowing for resource development while protecting environmental values. However, this approach proposes that an increasing highpercentage of resource development areas now be subject to controlled or restricted stipulations (Category 2 and 3) while substantially less resource acreage is subject to standard stipulations. In fact, percentage of lands classified as Category 2 and 3 increase from 50% to 77% while Category 1 development lands decrease from 50% to 23%. In a region heavily dependent upon the oil and gas industry and during*

## RESPONSE TO COMMENT LETTER 111 (QUESTAR PIPELINE COMPANY, Blackham)

111-1 The socioeconomics sections of the proposed plan/final EIS have been expanded from the draft. Please refer to the socioeconomics sections of Chapter 4.

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111-1

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Cont.

*somewhat difficult financial times, this reduction of available acreage presents a potential negative impact to the area's economic growth. The RMP/EIS should consider management direction that encourages oil, gas and mineral development which in turn supports the economic growth and stability of the surrounding communities and helps fund the state and federal agencies which manage the lands, resources and wildlife.*

2. *Designated "No Surface Occupancy" Areas:*

111-2

*Areas being considered for "no surface occupancy" (NSO) should be carefully evaluated prior to designation. Usually, NSO areas are restricted from use in order to protect particular wildlife species, improve riparian or range land areas, avoid water shed areas or close areas due to other environmental concerns. Often, the oil and gas industry has demonstrated that its activities can be scheduled and conducted without disturbance to wildlife or environmental issues. In addition, state-of-the-art construction and reclamation techniques have been successful in minimizing land disturbance and reducing environmental impacts. Overall the BLM is urged to work with industry where possible regarding particular NSO designated areas to resolve problems and allow development within these areas.*

5.150

3. *Existing Leases and Rights-of-Way:*

111-3

*Questar urges that BLM maintain provisions to acknowledge and honor the valid existing rights granted for leases and rights-of-way associated with the location and operation of existing facilities. These existing facilities located within proposed Wild and Scenic River corridors, recreational use areas, or ACECs should not be subject to new or additional conditions or stipulations contained within the RMP/EIS.*

4. *Utility Corridors:*

111-4

*The RMP/EIS Preferred Alternative apparently designates a "utility corridor" across the Diamond Mountain, Browns Park, and Ewing Canyon areas. This utility corridor has a bottle neck at Jesse Ewing Canyon. Presently four pipelines pass through the area. The proposed quarter mile wide corridor is to be reduced to 1/8 mile in the canyon due to slopes greater than 30% which is felt by the RMP to be unsafe for heavy equipment. The preferred alternative E states that the bottleneck will allow only a maximum of three new facilities in the corridor essentially closing the North-South passage between Utah and Wyoming. In Chapter 3 of the draft, EIS, it is stated that "Jesse Ewing Canyon in Browns Park has four major pipelines*

111-2

BLM should work closely with industry before NSO designations are formulated in order to allow development, while still protecting critical resource values. NSO stipulations are only proposed where they were deemed to be the least restrictive to protect crucial or important resource values.

111-3

Please refer to Chapter 1. Within the opening paragraphs of Chapter 1 the document states: "...valid existing rights take precedence over any management decisions depicted on the alternative maps. Nothing on the alternative maps should be interpreted as challenging those rights." Also within Chapter 1 the planning criteria (those constraints or ground rules to which the RMP and associated EIS are developed) specifically states: "All alternatives recognize the existence of valid existing rights. Nothing in the management options identified would preclude those rights." These directives also apply to the proposed plan.

111-4

Chapter 3 has been clarified to support the decision regarding the utility corridor through Jesse Ewing Canyon. Under the proposed plan the canyon would not be closed to major rights-of-way; however, we believe the Canyon could only support up to three additional rights-of-way.

111-4  
Cont. *and reached capacity". This North-South corridor is critical to energy transportation in the region. The route should not be closed at the present time and the RMP should be open to new technologies which could allow for the safe installation of new facilities while mitigating environmental impacts.*

5. **Black-Footed Ferret Reintroduction Areas**

111-5 *Proposed black-footed ferret reintroduction areas identified as Shiner and Antelope Flats overlap existing pipeline rights of way. The draft EIS places restrictions on surface activities from March 1, through August 31st within 1/4 mile of the habitat occupied by the black-footed ferret. However, the draft EIS states "these restrictions will not apply to maintenance and operation of existing facilities". These restrictions should not be placed on maintenance and operation when these rights of way are renewed.*

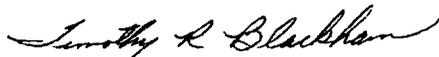
6. **Areas of Critical Environmental Concern**

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111-6 *The preferred alternative E creates several areas of critical environmental concern (ACEC), which overlap existing Questar facilities. The impetus into most of the overlapping ACEC's is the wildlife in the area. Sage grouse strutting grounds, critical deer and elk winter habitat, raptor protection zones and black-footed ferret reintroduction will all effect future pipeline activities in the area. The cumulative effect of these protection zones should not be to prevent current and future natural gas transportation and storage in area.*

*In summary, the Diamond Mountain Resource Area is in a critical area for natural gas activities. The unique geology of the area has allowed the development of an underground gas storage facility at Clay Basin. The utility corridors and pipelines in the area are critical routes for supplying natural gas to much of the country. One of the national environmental issues addressed in the RMP were activities that "...can positively affect current trends involving global climate changes and acid rain". Continued development of clean burning natural gas will have a positive effect.*

*Questar and its affiliate companies, have been active in the oil and gas business within areas covered by the RMP/EIS for over 50 years, and urges BLM to consider management direction which encourages economic stability and honors existing leases and rights. Questar appreciates the opportunity to submit these comments pertaining to the draft RMP/EIS.*

Very truly yours,



111-5 Under 43 CFR 2881.1-1(f) the authorized officer may modify the terms and conditions of the right-of-way at the time of renewal. According to the right-of-way grant authorized in 1989 for the Questar pipeline in question, the renewal date is October 2019, which should alleviate your concerns. It is reasonable to assume that restrictions concerning black-footed ferrets will probably be updated by the time Questar's right-of-way is renewed.

111-6 We believe the protection zones created in the proposed plan in the ACEC also offer windows of activity or areas that could be used for current and future natural gas transportation and storage.

March 20, 1992

Penelope Smalley, Team Leader  
Bureau of Land Management  
Vernal District  
170 South 500 East  
Vernal, Ut. 84078

Subject: Diamond Mountain Resource Management Plan Draft E.I.S.

Dear Ms. Smalley,

I must commend you and your team for the comprehensive effort in creating the Draft EIS of the Diamond Mountain Resource Management Plan.

112-1 After close review of the Diamond Mountain Resource Management Plan, I have some concerns about phosphate leases in the Red Mountain-Dry Fork Complex.

This is a very unique area because of it's wide diversity of high quality resource values within a close proximity to an urban area. It will be very important to determine the best use of this land. To do this we must first identify the resources of the area. The resources of the Red Mountain-Dry Fork complex are:

1. Recreation (Hunting, Fishing, Camping, Picnicing, Hiking, Skiing, Riding of Horses, Bicycles, Snowmobiles, and OHVs)
2. Scenic Vistas and Aesthetics
3. Riparian Areas
4. Wildlife Habitat (Including crucial winter range for Deer and Elk)
5. Cultural and Historical Resources
6. Watershed (Surface and Underground Aquafir)
7. Vernal Area Municipal Water Supply
8. Archeological and Paleontological Sites
9. Biological Diversity
10. Relict Vegetation

ACEC designation is in tune with the best use of these lands. In light of critical resource values identified in the ACEC nomination for this area, no alternative addresses the impacts to these resources should mining occur. Alternatives B, C, and E designate the Red Mountain, Dry Fork Complex as an Area of Critical Environmental

RESPONSE TO COMMENT LETTER 112 AND 113 (GODDARD)

112-1 Thank you for expressing your concerns. Please refer to our response 61-2.