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OFFICE OF PLANNING AND BUDGET
Resource Development Coordinating Committee

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Salt Lake City, Utah 84114
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March 26, 1992

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

SUBJECT: Draft Resource Management Plan/Environmental Impact Statement for the Diamond Mountain Resource Area
State Identifier Number: UT911223-010

Dear Ms. Smalley:

The Resource Development Coordinating Committee, representing the State of Utah, has reviewed this draft RMP/EIS. Following are comments from various state agencies:

**State Lands and Forestry**

Preferred Alternative

114-1 Designations such as management priority areas and special emphasis area, with associated surface occupancy restrictions, withdrawals, use restrictions, etc., may adversely affect trust land management goals within DMRA. For the alternatives presented, the management theme for Alternative D is the most consistent with trust management goals, therefore, the Division of State Lands and Forestry recommends Alternative D for the preferred alternative.

Utility Corridors

114-2 At this time, we see no reason why the state lands in the corridors would not be available for use as utility corridors. However, we cannot guarantee continued availability over the long term.

Land Exchanges

114-3 We are somewhat disappointed that the draft RMP doesn't specifically identify trust lands for potential federal acquisition. However, Tables 2-14 through 2-18 provide a reasonable framework for development of exchange scenarios. Given the apparent preference to

RESPONSE TO COMMENT LETTER 114 (Resource Development Coordinating Committee, Barber)

114-1 Thank you for your comment.

114-2 Thank you for your comment.

114-3 Standard operating procedures involving land ownership adjustments are outlined in Chapter 2. The DMRA Management Situation Analysis provides a list of state lands BLM would be interested in acquiring. For this reason the RMP includes guidelines that would allow the greatest management flexibility involving land ownership adjustments.

114-3 Cont. pursue exchanges/acquisitions as opportunities arise, we wonder which agency (BLM or DSLF) will make the first move. If we receive an application for a trust land use that the BLM may perceive as inconsistent with its objectives in an area, we may find it difficult to opt for an exchange to accommodate BLM's management objectives.

Executive Order Withdrawal

114-4 The oil shale protection withdrawal imposed by executive order is characterized as "**not being used for its intended purpose**" (page 3.20). The withdrawal seems to work to the detriment of other management objectives in the DMRA. Perhaps the RMP should develop the rationale for a recommendation by the Secretary of the Interior that the withdrawal be terminated.

**Utah Natural Heritage Program**

As with previous comments during the Diamond Mountain planning process, the Heritage Program response to the DRMP focuses on two major topics: 1) the identity and treatment of rare plants, and 2) the recognition and continued protection of natural areas on the Resource Area.

Rare Plants

114-5 Two definitions pertaining to rare plants in Appendix G of the DRMP were reviewed. The definition of "CANDIDATE SPECIES" (page G.2) is correct, but the definition of "SENSITIVE SPECIES (page G.12) may not be. In particular, we suggest checking the statement that "The sensitive list is made up of species listed as Category 3c in the *Federal Register*..." It is our understanding that the BLM list of sensitive species (at least plants) in Utah is essentially the same as the U.S. Fish and Wildlife Service (USFWS) list of Candidate species (Categories 1 and 2). That is, the BLM has provision for creating its own list of sensitive species, but for plants (at least) has chosen to make this list essentially identical to the USFWS Candidate species list, not the Non-Candidate (Category 3c) list. Clarification of this topic could probably best be done by the BLM State Botanist.

Table 3-26 on page 3.69 shows the identities and current status of special-status plants known or potentially occurring in the Diamond Mountain Resource Area. We suggest a few minor revisions to this table based on the following:

114-6 1. The table includes Non-Candidate (Category 3c) plants as well as Candidate and listed plants. However, the table does not include <u>all</u> of the known Category 3c plants on the Resource Area. We suggest that the table be consistent and include either all or none of such Category 3c plants. For sake of brevity, perhaps it would be best to include none of them.

114-4 Rather than remove the Oil Shale withdrawal in its entirety, the proposed plan specifically outlines those areas where a withdrawal termination is recommended.

114-5 Thank you for your comment. We agree, please refer to the Glossary for a correction of the term sensitive species.

114-6 We agree, Category 3C plant species have been deleted from the table.

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114-7 2. Status of a few of the plants are different than shown in the table, either through the table being in error or from status changes that have taken place since publication of the DRMP. We also suggest referring to Category 1 and 2 plants as "C1" and C2" rather than "1C" and "2C", in keeping with the most common usage of these abbreviations.

3. There are a few minor corrections needed based on taxonomic changes and spelling.

With these suggested revisions, the plants and statuses of Table 3-26 would appear as follows:

| COMMON NAME | SCIENTIFIC NAME | STATUS | (Heritage Comments) |
|---|---|---|---|
| Park Rock Cress | *Arabis vivariensis* | – | (To become C2 in '92) |
| Horshoe Bend milkvetch | *Astragalus equisolensis* | C1 | |
| Hamilton milkvetch | *Astragalus hamiltonii* | C2 | (Is not C1) |
| Ownbey's thistle | *Cirsium ownbeyi* | C2 | (Note correct spelling) |
| Untermann's fleabane | *Erigeron untermannii* | C2 | |
| Barneby's pepper cress or ridge cress | *Lepidium barnebyanum* | E[3] | |
| Flowers penstemon | *Penstemon flowersii* | C2 | |
| Gibbens beardtoague | *Penstemon gibbensii* | C2 | |
| Goodrich's beardtongue | *Penstemon goodrichii* | C2 | |
| Graham's beardtongue | *Penstemon grahamii* | C1 | |
| Clay reed mustard | *Schoencrambe argillacea* | T[4] | (Newly listed) |
| Toadflax cress | *Schoencrambe suffrutescens* | E[2] | (Not Glaucocarpum) |
| Uinta Basin hookless cactus | *Sclerocactus glaucus* | T[1] | |
| Ute ladies' tresses | *Spiranthes diluvialis* | T[4] | (Newly listed) |

114-8

1. 44 FR 58870; dated October 11, 1979
2. 52 FR 37426; dated October 6, 1987
3. 55 FR 39864; dated September 28, 1990
4. 57 FR 1403; dated January 14, 1992
5. 57 FR 2053; dated January 17, 1992

Next with regard to rare plants, we believe it is important for the eventual RMP to state the level of formal protection that will be given to special-status plants through law and/or BLM policy. This appears to be done adequately in the following parts of the DRMP:

114-9

1. In Chapter 2, under the section MANAGEMENT GUIDANCE COMMON TO ALL ALTERNATIVES, the management governing special-status plants (page 2.14) is the same as that outlined for special-status animals (page 2.5-6). The latter policies appear to be adequate for plants as well as animals, and it is appropriate that such management is the same in all alternatives.

2. The statements for "Special Status Species" on page 2.60 are also good (though there appears to be an unintentional double negative in the statement under Alternative A).

114-7 The table has been updated to reflect changes in status. Thank you.

114-8 Please refer to our response 114-7 above.

114-9 The unintentional double negative for Alternative A has been corrected.

114-9 Cont. 3. Under Alternative E, the above management directions appear to be further strengthened by defining listed T/E plant habitat as Management Level 2 and Candidate plant habitat as Management Level 3.

114-10 Finally, a key objective in the Recovery Plan for *Sclerocactus glaucus* was that certain significant populations of the species on public lands receive special designation and management protection. The designation and (most importantly) proposed management of the Nine Mile Canyon and Pariette Wetlands ACEC's appear to satisfy this Recovery objective. If the U.S. Fish and Wildlife Service concurs, then these two ACEC designations could hasten *Sclerocactus glaucus's* eventual removal from the list. The Heritage Program thus strongly supports designation and management of the Nine Mile Canyon and Pariette Wetlands ACEC's as proposed in Alternative E.

Natural Areas

114-11 The Natural Heritage Program supports ACEC designation as proposed in Alternative E for the three relict vegetation areas on the Diamond Mountain Resource Area. These areas are Red Mountain (north of Vernal), Castle Cove (northwest of Vernal) and Leers Canyon (tributary to Argyle Canyon). The first two are included within the larger proposed Red Mountain-Dry Fork Complex ACEC, while the latter would be an ACEC by itself. If the BLM decides to adjust the boundary of the Red Mountain-Dry Fork Complex ACEC as a result of public comments, then we recommend that the individual Red Mountain and Castle Cove relict areas retain their proposed ACEC status and management.

114-12 We support and recommend carrying forward almost all of the individual management prescriptions for the above two ACEC's, as shown in Table 2-18 of the DRMP. Rather than listing all of the items in this table with which we agree, we will only comment on one possibly questionable item. It concerns the prescription for fire in Leers Canyon found on page 2.114. In a near-relict area, it seems best to let fire have as near to natural a role as possible in the context of the surrounding lands. It is not clear if the "prescribed fire" in Leers Canyon refers to: (1) wildfires that are managed in certain ways rather than being immediately suppressed, or (2) fires that are intentionally set and then managed. In the latter case, it would not seem appropriate to let intentional burns be used as a tool to support crucial big game habitat management objectives as ends in themselves. Given Leers Canyon's small size and long/narrow orientation, there should be ample surrounding land on which to conduct intentional burns for big game habitat. As a contrast, the prescription for fire in the Red Mountain relict area (page 2.115) reflects the goal of maintaining fire's natural role.

**Division of Water Rights**

The Division of Water Rights has two concerns that we would like to see addressed in the final EIS. They concern (1) water rights for instream flow, and (2) wetland improvement at Pariette Draw.

114-10 Thank you for your support of these ACEC nominations.

114-11 Thank you for your support of the ACEC designations for the relict vegetation areas. The boundaries of the encompassing Red Mountain-Dry Fork ACEC Complex has not been modified in the proposed plan.

114-12 BLM agrees. We have changed the fire prescription for the Lears Canyon ACEC in the proposed plan to read: "Maintain the natural role of fire within the relict vegetation area. Large scale fires would not be allowed to kill more than 50 percent of the pinyon-juniper community, or 40 percent of the Douglas fir-mountain browse community in Lears Canyon over the life of this RMP. Outside of the relict vegetation area, allow fire to burn under prescribed conditions to support the stated values of a vigorous, healthy vegetation community, to support critical soils; and, crucial wildlife habitat."

114-13 In several locations in the EIS, it says that the Bureau of Land Management will seek to acquire water rights on certain streams for the purpose of maintaining instream flows and riparian habitat. However, there is no explanation of how such water rights will be acquired. At this point, we assume that acquisition will be made from willing sellers and in accordance with Section 73-3-3(11), Utah Code Annotated. Whatever method the BLM chooses to fulfill their objective should be stated in the final EIS and conform to state law.

114-14 The BLM also proposes to improve the wetland habitat in the Pariette Draw area. They give little information in the Draft EIS on how they will accomplish this improvement. We are particularly interested in where they propose to get the water they will need for making the improvement. Again, their methods should be stated in the final EIS and conform to state law.

**Division of Wildlife Resources**

**Alternative A**

114-15 This alternative places seasonal restrictions on activities occurring in sage grouse nesting areas and peregrine falcon nesting habitat, but the restrictions are not adequate. Restrictions on sage grouse nesting habitat should be from mid-March through June and peregrine restrictions should be from February through August.

114-16 Page 2.18, Paragraph 4 states that surface-disturbing activities would be allowed within the 600-foot riparian buffer zone if there was no practical alternative. However, there is no mention of mitigation measures if such activities were to take place. Riparian habitats are critical to most wildlife species. Surface disturbing activities result in severe negative impact through loss of such habitat. The BLM's Riparian Area Management Policy states that long-term losses of riparian habitat must be mitigated. If this alternative is chosen, mitigation measures must be included in environmental assessments tied to this RMP. We also believe a statement referring to coordination between your resource area and the Army Corps of Engineers would be necessary before any decision document is signed concerning potential loss of jurisdictional wetlands.

Alternative B

114-17 This alternative is the alternative of choice for the Division of Wildlife Resources. It provides for active management of wildlife populations and wildlife habitat. It provides for restriction of activities which would adversely affect wildlife species. This alternative also provides the greatest protection to critical wildlife habitats and wildlife species which are threatened, endangered, or in need of special attention. From a wildlife perspective, this would be the preferred alternative.

114-13 The following statement has been added in Chapter 2: "Water rights acquisition will be made from willing sellers and in accordance with Section 73-3-3(11) Utah Code Annotated.

114-14 BLM proposes to continue habitat maintenance and development at Pariette Wetlands for waterfowl production, riparian enhancement, and reduction of sediment loading of the Green River. Any additional water acquisitions for Pariette Wetlands would be from willing sellers and in accordance with Section 73-3-3(11) Utah Code Annotated.

114-15 Please note, comments 114-15 through 114-33 are identical to comment letter #8 (UDWR, Moretti). Please refer to our response 8-2.

114-16 Refer to our response 8-3.

114-17 Refer to our response 8-4.

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Alternative C

114-18 While this alternative provides restrictions on sage grouse strutting grounds, no protection zone is described. This alternative also lacks adequate seasonal restriction of activities for sage grouse nesting areas and peregrine falcon nesting areas. Sage grouse restrictions should be from mid-March through June and peregrine restrictions should be from February through August.

114-19 This alternative does not provide for protection of potential bighorn sheep and black-footed ferret reintroduction sites. This should be included in the DMRMP as these are animal species requiring special consideration. Existing BLM Habitat Management Plans for this area outline actions for the reintroduction of bighorn sheep and black-footed ferrets (Page 2.7) and should be considered in this RMP.

114-20 Any additional AUMs realized through range improvements would be assigned to livestock. We realize that this is the objection of this alternative, but not allocating any of the additional AUMs for wildlife makes this alternative unsatisfactory to DWR.

114-21 The riparian buffer zone is only 330 feet in this alternative. While this provides for some protection of these sensitive areas, a 600 foot or greater buffer zone would be preferred. There is no mention of mitigation for riparian habitat loss when such loss is unavoidable. Mitigation must be considered for riparian losses.

Alternative D

114-22 Concerns regarding this alternative are similar to those expressed under Alternative C. There is no protection zone outlined for sage grouse strutting grounds. Seasonal restrictions are not adequate for sage grouse and peregrine falcons. Black-footed ferret introduction sites do not receive adequate consideration and protection. Additional AUMs acquired through range improvements are assigned to livestock with none assigned to wildlife. The intent of this alternative is to minimize wildlife restrictions to mineral exploration and development. Impacts from these activities often have a negative effect on most wildlife species. These impacts must be considered in the RMP. Page 2.5, Paragraph 8 states that it is the BLM's responsibility to recognize opportunities to maintain, improve, and expand wildlife habitat. Activities related to mineral exploration and development often conflict with this objective. Alternatives which minimize negative impacts on wildlife should be considered.

Alternative E

114-23 This alternative provides for the best implementation of multiple use of the resource area. The DWR supports the effort to protect wildlife and the environment while providing for the development of other resources. We would suggest that wildlife be considered initially for additional AUMs developed from range improvements. Page 2.30, Paragraph 7 states that these AUMs would initially go to livestock. Experience has shown that it is difficult

114-18-20 Refer to our responses 8-5 through 8-7.

114-21 Refer to our response 8-8.

114-22 Refer to our response 8-9.

114-23 Refer to our response 8-10.

114-23 Cont. to assign AUMs to wildlife that were previously assigned to livestock. We would also suggest that the riparian buffer zone be expanded from 330 feet to 600 feet as in Alternative A. This would allow for greater protection of critical riparian areas.

The following comments may apply to several of the alternatives:

114-24 Monitoring should occur to identify areas of use by peregrine falcons. DWR is concerned that prairie falcons and goshawks were omitted from the list of raptors occurring in the area. There are known locations of these species in the Nine Mile Canyon and other areas. The Northern goshawk is a USFWS category 2 species requiring special management. The prairie falcon is a raptor of special concern. Ferruginous hawks, also a USFWS category 2 species, are located within the DMRA. A 0.5 mile buffer zone around active nests and seasonal restrictions from March through July would be required for these species. We would also like to emphasize the presence of golden eagles in the area. DWR would like raptor surveys conducted prior to implementation of management activities. After the data is gathered, it should be made available to us for inclusion in our database.

114-25 Seasonal restrictions on critical elk and deer winter ranges would not be required if animals were not present on the site (Page 2.35). For short-term activities this would be acceptable. However, for long-term activities, we are concerned with this statement. Although animals may not be present one year, if an area is designated as critical winter habitat, then use has occurred in the past and is likely to occur in the future. Allowing activities with long-term impacts could cause big game animals to be displaced into poor quality habitat.

114-26 While surface-disturbing activities and OHV use are not allowed within sage grouse buffer zones, grazing is allowed (Page 2.36). Seasonal restrictions of grazing within the outlined buffer zones from March 1 to June 30 should be considered. Guidelines adopted by DWR, BLM, and USFS state that a two-mile buffer zone be established around sage grouse leks and protected from vegetative treatments. Sage grouse populations and habitat are declining. This species provides unique hunting and viewing opportunities and critical habitats, such as leks and nesting areas, need to be protected.

114-27 In order for adequate habitat to be maintained for possible bighorn sheep reintroduction, domestic sheep must be excluded from these areas. Disease is a major contributor to declines in bighorn sheep populations. BLM must make a serious effort to eliminate domestic sheep in bighorn habitat by changing classes of livestock or exchanging grazing permits, or retiring permits (Page 2.40). DWR should be involved in negotiations and kept informed of possible conflicts and alternatives.

114-28 Increased vehicular access as outlined on Page 2.41 presents some negative impacts on wildlife. Many studies have shown that increased use by improving access causes many wildlife species to abandon the area. Species particularly sensitive to such disturbance include black bears, cougars, raptors, bighorn sheep, and elk. We would suggest that

114-24 Refer to our response 8-11.

114-25 Refer to our response 8-12.

114-26 Refer to our response 8-13.

114-27 Refer to our response 8-14.

114-28 Refer to our response 8-15.

114-28 Cont. access improvements concentrate on horse, foot, and bicycle trails. This could reduce impacts to wildlife.

114-29 In addition to the road restrictions placed on OHV on Page 2.50, seasonal restrictions outlined for wildlife should be applied to OHVs in areas critical to wildlife such as leks, nesting areas, wintering areas, and fawning and calving areas.

114-30 DWR should be consulted during analysis of cases involving the harvest of ponderosa pine, aspen, cottonwood, and other large conifers as outlined on Page 2.62.

Regardless of which alternative is chosen, guidelines for seasonal restrictions and buffer zones for the protection of important wildlife species should be followed. These restrictions would apply if the species is present in the area. Clarification of these guidelines follows:

Seasonal restrictions -

| | |
|---|---|
| Mule deer | 12/1 - 4/15 and 5/15 - 7/5 |
| Elk | 12/1 - 4/15 and 5/15 - 7/5 |
| Antelope | 5/1 - 6/30 |
| Goshawks | 4/1 - 7/20 |
| Ferruginous hawks | 3/1 - 6/15 |
| Golden eagles | 2/1 - 7/15 |
| Peregrine falcons | 2/1 - 8/31 |
| Prairie falcons | 4/1 - 7/15 |
| Sage grouse | 3/15 - 6/30 |

114-31

Buffer zones -

| | |
|---|---|
| Peregrine falcons | 1 mile |
| Bald eagles | 1 mile |
| Other raptors | 0.5 mile |
| Bighorn sheep | 0.5 mile from canyon rims and talus slopes |

114-32 There are several statements to the effect that restrictions can be waived following site specific analysis which receive a "no effect" or "no practical alternative" result. DWR would like to be involved with and informed of such analyses in order to determine the effects on wildlife before restrictions are waived.

114-33 The following species are listed as sensitive by the state of Utah and potentially occur in the DRMA. Actions which could potentially have negative effects on these species must either be considered, steps taken to minimize impacts, or mitigated for losses. These species include:

| | |
|---|---|
| Dwarf shrew | Purple martin |
| Red bat | Utah milk snake |
| Spotted bat | |

114-29 Refer to our response 8-16.

114-30 Refer to our response 8-17.

114-31 Refer to our response 8-18.

114-32 Refer to our response 8-19.

114-33 Refer to our response 8-20.

Proposed decisions on Page 2.35 suggest bear baiting be allowed by permit only in Alternatives A, C, and D. Alternatives B and E indicate that bear baiting permits will not be issued. The DWR is opposed to not issuing bear baiting permits. Our stand indicates that bear baiting is an acceptable method of hunting bears, as outlined in our cougar and bear hunting regulations. The methods of taking are under the jurisdiction of the Utah Wildlife Board.

114-34 Bear harvest rates are regulated by totally limited permit numbers. Baiting, which is only permitted when the bears are harvested with archery tackle, is an important method of allowing archers to get close enough to harvest a bear. If archers weren't allowed to hunt over baits, using dogs would be the only practical method of harvest. Not all archers choose to utilize dogs.

If cleanup of the bait site is the issue, the BLM certainly has the responsibility and prerogative to regulate this potential problem. Bear bait sites are like oil drilling sites, firewood sales, and other activities where humans can affect the environment. Like these other activities, satisfactory cleanup stipulations should be incorporated into the permit and enforced.

114-35 DWR appreciates the wildlife stipulations identified and proposed in Appendix 2. All of these stipulations are considered essential to effective management of wildlife and mitigation of impacts.

114-36 Management guidelines identified for black-footed ferrets on Page A2.11 indicate that Alternatives A & E would continue to support DWR hunting regulations as they apply to prairie dogs. This should also be applied to Alternative B.

114-37 The Division of Wildlife Resources would like to review and comment on the final Resource Management Plan and Environmental Impact Statement. If questions arise, please contact the appropriate Regional Habitat Managers. They are Clay Perschon and Ken Phippen for the Northeastern and Southeastern regions, respectively.

**Division of Oil, Gas, and Mining**

From our review of the RMP/EIS, it is obvious that a great deal of effort and craftsmanship has been employed in its development. Furthermore, our field trip to the area with the EIS team was helpful in understanding the complex issues involved.

There are, however, two areas in the scheme of the planning effort with which we take issue and feel deserve comment. One issue concerns the use of "No Surface Occupancy" (N.S.O.) as a lease stipulation, the other is in how the RMP/EIS will affect solid minerals development and use.

114-34 We agree, UDWR does control the method of taking. However, the proposed decision would not allow the issuance of bear baiting permits due to the potential public health hazard and conflicts with recreational users. Please refer to our response 70-3.

114-35 Thank you for your support.

114-36 Thank you for your comment.

114-37 UDWR will receive copies of this document.

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No Surface Occupancy

The use of no surface occupancy appears to be a stipulation which is used to replace careful management of juxtaposed resource uses. Further, the RMP/EIS does not contain any technical analysis as to whether N.S.O., as a lease stipulation, enables a lessee to, when used, actually recover minerals under a lease. Currently, 8%, or 66,000 acres of the resource area is categorized as N.S.O. (Page 3.29) for Oil and Gas Development. Under Alternative "E", the preferred alternative, this amount would increase to about 12% of the resource area, or 90,100 acres (Page 2.47). Without an analysis or a presentation of the technical feasibility of how possible oil or gas drilling and recovery may occur under N.S.O. stipulations, an analysis of cumulative impacts (as is presented on page 4.61 for Alternative E) is not possible.

One solution to the lack of this technical analysis would be to include it in the document. As an alternative, however, rethinking the compatibility of uses and the timing of certain uses may be a more efficient and effective way to approach the dilemma. 114-38

As an example, N.S.O. is proposed as a lease stipulation for all level 1 and 2 lands in the Brown's Park Complex. The exact acreage involved is uncertain, as the calculated amount of winter range required. Since the Brown's Park Complex contains crucial deer and elk winter range, special consideration is warranted in this area. Therefore, considerations such as timing of drilling activity, the site specific nature of drilling activity, and the concept of drilling which, which requires specialized mitigation, should be utilized in place of no surface occupancy applying to the complex as a whole.

This same creative approach should also be examined as an alternative to applying an N.S.O. lease restriction in the 18,300 acres of potential black-footed ferret habitat. These areas with potential for ferret reintroduction will have significant negative impacts on seven percent of the high potential oil and gas areas in the Myton Bench - Nine Mile Canyon and Horseshoe Bend - Ashley Valley oil and gas regions. (Page 4.67 Alternative E Impacts). The Pariette Wetlands are listed as an area which require special emphasis in management as an A.C.E.C. Instead of applying the blanket N.S.O. stipulation to level 1 and 2 lands, these areas in Pariette Wetlands should be designated as places where special stipulations would be applied to drilling activity or development.

Solid Minerals

Tar sands development and use would be precluded under the application of Alternative E, due to the Pariette STSA's designation as level 2 land. While we can understand the need for protection of the Pariette Wetlands, it appears that the use of currently available reclamation technology needs to be examined as part of the alternative. Given the opportunity for special lease stipulations requiring land reclamation, precluding the development of asphaltic materials is not warranted. 114-39

114-38 Upon review of the extent of lands with NSO stipulations in the proposed RMP category map, and current horizontal drilling technology, it is concluded that NSO stipulations overall do not significantly impact the technical feasibility of extracting oil and gas resources.

The NSO stipulations proposed in the proposed RMP are not "blanket" in nature and are described below for the Brown's Park Complex, the black-footed ferret reintroduction area (Eight Mile Flat), and the Pariette Wetlands areas. We believe current technology involving horizontal drilling could be used successfully in these areas to access oil and gas from adjacent non-BLM administered surface lands (e.g., state or private lands).

In the proposed final RMP, NSO stipulations concerning crucial deer winter habitat in the Browns Park Complex would be applied only to the crucial sagebrush vegetation type and is not a blanket stipulation (please refer to Appendix 4).

In the proposed RMP reintroduction of the black-footed ferret is proposed only at one site (Eight Mile Flat). The area will not be covered by NSO stipulations either prior to or after reintroduction. Rather prior to reintroduction the area will fall under a lease notice (see Appendix 4) and following reintroduction a controlled surface use stipulation (see Appendix 4).

The NSO stipulations which will apply in the Pariette Wetlands ACEC are outlined in Appendix 4 and are for: Special status plant species, and goose nest sites. These are specific stipulations applied to specific areas and are therefore not blanket NSO stipulations.

114-39 The decision involving tar sands has been modified in the proposed plan. Please refer to Table 2-15.

114-40 In another solid mineral area, phosphate, Alternative E, appears to address the potential opportunity to develop the preference right leases (6,650 acres) in a manner which is preferable to the other alternatives. The opportunity to use specific restrictions to minimize adverse impacts to crucial deer winter habitat (Page 4.56) is indicative that this technique can be used in other areas, i.e. Brown's Park.

Summary of DOGM's Position

114-41 The planning employed in the Diamond Mountain Resource Area is complex and, we trust, a dynamic process. If the planning team would examine the parts of the RMP/EIS which we have noted above, the use of no surface occupancy lease stipulations, and the use of site reclamation as a mitigation tool, the plan would better address minerals management from our perspective. We encourage the BLM to be creative in its approach to using special lease stipulations, at both the leasing and minerals development stages. If there is a need for further clarification of the Division's comments, we will be glad to discuss them with the RMP/EIS team.

The Committee appreciates the opportunity to review this proposal. Please direct any other written questions regarding this correspondence to the Utah State Clearinghouse at the above address, or call Carolyn Wright at (801) 538-1535 or John Harja at (801) 538-1559.

Sincerely,

Brad T. Barber
State Planning Coordinator

BTB/rpj

114-40 As discussed in our response 114-38 above, the proposed NSO stipulation is not a "blanket" stipulation, but applies only to the sagebrush vegetation communities in Browns Park. Cooperative studies with UDWR have documented significant numbers of deer from four herd units traveling up to 70 miles to winter in the confines of the park. We believe this data supports the crucial nature of this community, thus resulting in the NSO stipulation. We do not have sufficient data to support such a restriction on the crucial deer winter range on the much larger southern slope of the Uintas. Also the exploration and development methodologies of oil and gas and phosphate recovery are significantly different. We believe it is appropriate at this time to recommend only special restrictions to future phosphate development, not NSO stipulations on the south slope of the Uintas.

114-41 Please refer to our response 114-38 above.

1610
1782

TO: Vernal District Manager

At our meeting of March 17, 1992, the Vernal District Advisory Council reviewed and discussed the Diamond Mountain Resource Management Plan. Following a straw vote that indicated five votes for Alternative A and five votes for Alternative E, The Council passed a resolution as follows:

That the Bureau of Land Management recognize that the Council did not pass a specific resolution on any of the alternatives because none received support of a majority of the Council members. However, the Council requests that as the final Resource Management Plan is completed, that the Bureau consider the concerns expressed by individual members as recorded in the minutes of the meeting.

These concerns are briefly summarized as:

1. Alternative E best manages riparian areas.

116-1 2. On page 4.23, there was an objection to the use of the word "insignificant" in describing the importance of the livestock industry.

116-2 3. The RMP should address what would happen if there were feral horses discovered on BLM lands in the Resource Area.

116-3 4. Consider the affect of wildlife grazing in riparian areas.

116-4 5. On page 2.31 the section on vegetation treatment does not say anything about chemical treatment in Alternative E. There should be some chemical treatment, particularly of weeds.

116-5 6. On page 8.25 the totals on vegetation treatment are not correct.

116-6 7. On page 4.54, there was a question as to whether a citation of "Bangerter" is a proper source of data for wildlife values.

116-7 8. On page 4.54, there was a question as to whether the $9.19 figure for an AUM was properly used in describing the value of an AUM to the local economy. There may be more current data from the University extension that indicates a value more like $25 per AUM.

116-8 9. There may be new data from University extension that shows there is no need for a buffer between domestic sheep and wild big horn sheep.

116-9 10. On page 2.35, bear baiting is eliminated. This is an emotional issue and any decision should be based on wildlife needs.

RESPONSE TO COMMENT LETTER 116 (VERNAL DISTRICT ADVISORY COUNCIL, Beers)

116-1 Utah's beef industry does not represent a significant portion of the Nation's beef production when viewed from a national point of view. However, locally it is significant as indicated in the socioeconomic section of Chapter 4. Also please refer to our response 104-2.

116-2 Please refer to Chapter 2 dealing with wild horses. In the proposed plan DMRA recommends the Range Creek Herd Management Area Boundary be adjusted to exclude that portion of the herd management area within DMRA. No other wild horse herd management areas will be designated. Any feral/ wild horses detected within DMRA will be subject to the provisions of the Wild Horse and Burro Act or to the estray laws, as applicable. Until the recommendation has been accepted, DMRA will continue to provide 49 AUMs for wild horses in this HMA.

116-3 As stated in Chapter 4 under impacts to riparian habitat: "Allowing wildlife forage to increase for wildlife use up to 67 percent from present forage use levels could cause unacceptable use on riparian areas, especially during drought years when wildlife would concentrate in wet areas." Significant impacts to riparian by implementing the proposed plan is not expected; however, as part of Standard Operating Procedures outlined in Chapter 2 for Vegetation Resources, it states: "Temporary adjustments in use due to effects of drought would be made to livestock and wildlife as shown by monitoring."

116-4 Please refer to Chapter 2 management common to the proposed plan and all alternatives for vegetation. For the proposed plan chemical treatment is one alternative method allowed for the proper management of the vegetation resource.

116-5 Thank you for your attention; the correction has been made to the Table A8-4.

116-6 The citation has been corrected to USF&WS, 1985; please refer to the reference section.

116-7 Please refer to the clarified discussion of socioeconomics in Chapter 3.

116-8 The majority of current data would suggest the need for a buffer between domestic and bighorn sheep. Such a buffer would protect both species

116-9 Cont. Consideration of whether to allow bear baiting is inappropriate in a planning document. Stick with Alternative A which would allow continuation of bear baiting.

116-10 11. No alternative addresses surface disturbing mining strongly enough, particularly phosphate mining in the Dry Fork/Red Mountain area.

116-11 12. Allow no reintroduction of black footed ferrets.

116-12 13. Leave the Red Mountain area open to off road vehicle use.

Signature: _____ Date: 3/30/92
Randy Beers
Council Chairperson

from possible transmission of harmful pests and disease. Please refer to our response 110-10.

116-9 Please refer to our response 70-3.

116-10 Please refer to our response 114-1.

116-11 Thank you for your comment. Please refer to our response 90-1 concerning black-footed ferret reintroductions.

116-12 Please refer to our response 13-1.

(1)

To: Ron Trogstad
Diamond Mtn. R.A. Manager
170 So. 500 E.
Vernal, UT 84078

From: Scott Williams
692 Nall St
S.L.C. UT 84103

Please send copy of the draft EIS to this address

Dear Ron,

It has been brought to my attention that BLM has released its Draft EIS ~~for the~~ and RMP for Diamond Mountain Area. I would like a copy of this document, as management of this area is of great concern to me. I have spent much time, as a Utah native, enjoying the wildlife and Indian heritage of this area, and I know it well. It contains important habitat for rare and endangered wildlife, as well as potential for reintroduction of such wildlife. Visits to the area have made

(2)

my concern, as I have witnessed adverse effects of grazing, ORV, and other activities. I would like a chance, as an effected member of the public, to play a part in considerations for future management of this area. I have been briefed on the current draft document, and it sounds as though alternative B may have some promising ideas. But without the opportunity to view the document, I cannot be as specific as I would like.

If, for some reason, I cannot obtain a copy of the EIS from you, please note the following comments on future management of this area:

117-1 - Any alternative that would allow any bear baiting is absolutely intolerable.

117-2 - Reintroduction of wildlife, incl. the black footed ferret, should be a high priority.

117-1 Please refer to our response 70-3.

117-2 Thank you for your support.

(3)

117-3 — Considering recent events both nationally and especially in the West, any NEPA document that fails to offer a full range of alternatives related to grazing — INCLUDING A "NO GRAZING ALTERNATIVE — is surely inappropriate, and probably illegal.

117-4 — ACEC and Scenic River designations are crucial to this already highly fragmented area.

117-5 — ORV use should be eliminated or limited to existing ROADS only.

I will respond in greater deal after I have the opportunity to review the draft EIS. Thank you for your cooperation and consideration.

Sincerely,

Scott Williams

Scott Williams

117-3 FLPMA, section 102, states that public lands be managed in a manner that will provide food and habitat for fish and wildlife and domestic animals. Livestock grazing is considered a "principal or major" use on public lands along with fish and wildlife development and utilization, mineral exploration and production, rights-of-way, outdoor recreation, and timber production. Although different amounts of acreage would be closed to livestock grazing by alternative, a no-grazing alternative is considered unnecessary and counter productive to solving resource problems. There is a range of alternatives for forage allocation. Please refer to Table 2-15 for vegetation allocations for the proposed plan and each alternative.

117-4 Thank you for your comment.

117-5 Restrictions are placed on OHV use to protect sensitive are as that could be damaged if use was allowed to proceed without limitations. Individual RMP team members identified these sensitive areas and the needed limitations to OHVs. Areas that were identified as nonsensitive to OHV remain open to such use. BLM cannot limit OHV use without a good reason.

March 26, 1992

Dear Mr. Troxstel:

This is in response to the BLM's proposed alternatives re: the Diamond Mountain Resource Management Plan.

It would be appreciated if you would consider the following modifications to Alternatives "B" and "E":

118-1 (1) All the Browns Park Complex ACECs and the Nine Mile Canyon ACEC should be closed to mineral entry.

118-2 (2) All the critical category 1 and 2 lands should be closed to mineral leasing including the Cissy National Wildlife Refuge and not merely leased with no surface occupancy stipulations.

118-3 (3) All of Diamond Mountain should be closed to mineral development.

118-4 (4) All ACECs and Wild and Scenic Rivers should be closed to mineral development and ORV use except on existing and designated roads. The entire length of the Green River in the Resource Area should be protected as a critical habitat/travel corridor.

118-5

## RESPONSE TO COMMENT LETTER 118 (BERNARD)

118-1 Please refer to the Summary of this document for a discussion of the management priority area concept. Chapter 2 provides a detailed list of the management levels and the resource values assigned for the proposed plan and each alternative. We believe it would be counter productive to close the entire Browns Park Complex and Nine Mile Canyon to mineral entry.

118-2 BLM-administered mineral estate would only be closed to leasing when it is determined that other land uses or resource values cannot be adequately protected even with the most restrictive lease stipulations and that appropriate protection can only be ensured by closing the lands to leasing.

118-3 Please refer to our response 118-2, above.

118-4 We agree that ACECs and rivers proposed for designation as wild and scenic rives need special protection. Each of these areas possess certain values that make them special. We identify these values and propose management of these areas to protect these special values. If we feel protection requires closing an area to mineral leasing or restricting OHV use to designated roads and trails, that is what we do. Using this method we often find that ACECs and rivers proposed for wild and scenic designation can be managed using a variety of management practices. That is why some areas in an ACEC, for example, may be closed to mineral leasing and OHV use, while other areas can accommodate both uses with no adverse affects.

118-5 The entire length of the Green River that flows through the resource area was evaluated for possible wild and scenic river designation (see Appendix 7). Based on this evaluation and public comment it was determined to drop the section between Dinosaur National Monument and the public land boundary north of Ouray from further study in the proposed plan. The remainder of the Green River was brought forward in the proposed plan for possible designation in the Wild and Scenic River System.

-2-

118-5 Cont. and studied for Wild and Scenic River status.

118-6 (5) All riparian areas should be closed to ORV use.

118-7 (6) BLM should consolidate land holdings on Diamond Mountain, and not further confuse land ownership patterns by trade.

Thank you.

Sincerely,

Bonnie Bernard
2060 East 4800 South
Salt Lake City, Utah 84117

118-6 We believe it is unnecessary to close all riparian areas to OHV use in the proposed plan to maintain or improve riparian conditions. Although intensive OHV use in riparian areas can be damaging, many riparian areas in the resource area receive very little OHV use currently, and most likely will not receive heavy use over the life of the plan. However, riparian areas in the proposed plan that would receive special consideration are the upper Green River segment in Browns Park and Pariette Wetlands. In these areas, OHV use would be limited to designated roads and trails. The upper Green River is getting increased OHV use, while Pariette is an important waterfowl nesting area. Refer to the Utah State Riparian Policy in Appendix A6.1. In Alternative B, OHV use would not be allowed within 700 feet of riparian areas.

118-7 Please refer to Chapter 2, management common to the proposed plan and all alternatives, for lands and realty management regarding land ownership adjustments.

March 30, 1992

Dear Ms. Smalley:

167-1 This is my comment in regard to the draft Diamond Mountain Resource Management Plan. Of the five alternatives, I prefer "B." It comes closest to managing the resource area with biodiversity in mind, which is the key to the type of management that will promote the long term health and stability of the land. I especially like its emphasis on endangered species protection, ferret reintroduction, Wild and Scenic Status for the Green River, greater care in managing the Browns Park area, foot access to Ashley Gorge, and protection of Red Mountain, Dry Fork canyon, and of the slickrock areas above Red Fleet. However, there still isn't enough emphasis on enforcement, and the document's socioeconomic categories are appalling--they label anyone in
167-2 favor of careful use of the land as a "young newcomer" and reserve the title of "worker" only for those who favor exploitive use of the earth. That is extremely offensive and very inaccurate. One other general observation regards bear baiting; this lazy person's way of hunting, like hounding,
167-3 shouldn't be allowed on public land.

It may well be that you'll end up choosing alternative E. If so, please modify it by incorporating the Uintah Mountain Club's proposed changes. These proposals, which I was involved in formulating, are definitely not of the let's-ask-for-a lot-more-than-we-want-and-hope-
167-4 we-end-up-getting-exactly-what-we-want variety. They are an attempt by a variety of people to compromise and come up with a solid proposal that should need no further dilution. If anything, they don't go far enough toward promoting biodiversity and nondestructive recreation.

My main concern with the RMP involves the Red Mountain area. *No* alternative adequately protects this area. All of Red Mountain, as well as the slickrock extending eastward into the rock formations north of Red Fleet reservoir and westward across the bottom of Taylor Mountain and up into Dry Fork Canyon, should be protected not just as an ACEC, but by level one management. *The Red Mountain area should be protected as a semi-primitive, nonmotorized area!* Additionally, it should get VRM class one designation. This area meets the criteria for such management, it deserves it, and it should have it! (Actually, it should have been designated a wilderness study area and included in the BLM's wilderness proposal). It is important to the maintaining of the integrity of the area that the BLM acquire sections 16 and 2 on Red Mountain, especially 16, and include them in this overall management plan. Also, as much surrounding area as possible should receive
167-5 level two management.

From forest to year-round riparian areas to slickrock, Red Mountain has a diversity of life and landforms. This area has the finest scenic values of any spot in northeastern Utah. The geological outcrops, pinnacles, and fins, the red uplift, the large arch, and the relict vegetation community make this both a scenic and an educational and scientific area of value (and it is utilized by local teachers). It is also very valuable for wildlife forage. There are a number of areas that are potential habitat for endangered species; they should be checked for the possible presence of such species, and for suitability for reintroducing species. Also, it is part of a high density archaeological/paleontological area, and is know to have ancient cultural sites and art. Two other values are important and interrelated--watershed and recreation. This area is not only very beautiful, it is very fragile. Much, probably most of the soils on the lower half of the mountain are cryptogamic. Motorized recreation is destroying those soils. Steinaker Draw is showing the effects of this erosion, with sediment washing through deep channels into Steinaker Reservoir much more rapidly than it should. This would not happen if the mountain were protected for its multiplicity of values. Designating it a nonmotorized area would preserve the watershed and allow for outstanding opportunities for solitude in a wondrous setting just a few miles from Vernal. The area will lose most of its values in proportion to its use by OHV riders.

## RESPONSE TO COMMENT LETTER 167 (WAKE)

167-1 Thank you for your support.

167-2 The socioeconomics portions of the document have been substantially reworked. Please refer to our response 103-5.

167-3 Please refer to our response 70-3.

167-4 Please refer to our responses 103 (UMC, Borton) and 228 (UMC, Durrant) for our specific responses to the Uintah Mountain Club's comments.

167-5 Please refer to our response 79-2.

I understand that the OHV users are very much in favor of Alternative A. I am in fairly close contact with a few of these individuals and am dismayed by their attitude, which is basically that they should be allowed to ride wherever they want, and that any area that might be closed to them should immediately be fought for regardless of its other possible uses. They justify their activities in part by claiming that the weather washes away signs of their passage. This is definitely not true of Red Mountain. I have photographic and video evidence which the BLM is welcome to of long term damage that has been done to this area by OHVs. There are eroding ruts, tire-blackened slickrock, litter, and vandalism through much of the area accessible to vehicles (and vehicles have tried to get to all of it). Please keep in mind that you have an obligation to protect a variety of values, and to promote a variety of uses of public land including quiet, nondestructive uses. This area's values do not involve grazing, mining, or other economic activities, they involve aesthetic, biological and other values as noted above, values that are not compatible with motorized vehicles. There are many other areas to ride in. For example, the "sand hills" north of Steinaker Reservoir are used by OHVs a lot more than the mountain itself, and could be left open for their use (the Uintah Mountain Club's proposed boundary for the lower part of the Red Mountain ACEC deliberately avoids this area). Red Mountain should be protected, and designated for walk-in recreational use only. In keeping with this, even mountain bikes and rock climbers drilling in fixed protection should be prohibited.

167-5
Cont.

In conclusion, I ask you to consider that the economic, physical, and mental health of the people of the Uintah Basin will be best served over the long run by keeping intact the web of life that we are a strand in. Emphasize biodiversity in your final plan and forgo short-term economic projects that do long-term environmental damage, in favor of a stable, earth-friendly plan. You included a quote on conservation by Aldo Leopold at the beginning of the draft RMP/EIS. Please keep in mind the quote that perhaps best sums up that great man's philosophy: *"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."* Thank you for you consideration of my views.

Sincerely,

Paul Wake

Paul Wake

848 W. 400 S.
Vernal, UT 84078
789-8235

*Dinaland Snowmobile Club*

*Vernal, Utah 84078*

February 22, 1992

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

Dear B.L.M.:

Here are brief comments regarding the Diamond Mt., Red Mt. and Dry Fork Management Plan Proposal:

168-1 1. The plan is difficult to interpret for the layman. If pubic input was the intent, then the language would discourage this. Un-necessary word and idea abbreviations, and the use of scientific terms, serve no purpose for encouraging input from the average citizen.

168-2 2. No single alternative is acceptable; there are none that allows continued use of Red Mountain by RHVs on existing expert and novice trail systems.

168-3 3. While we are all environmentally conscious, the plan belabors environmental concerns and almost completely ignores most recreational use and economic values of areas.

168-4 4. Specifically, we would like Red Mountain to remain open for use as is with no restrictions unless irresponsible damaging is caused and can be authenticated. This means keeping the present major trail open for OHVs and the expert trailing systems left open.

168-5 5. Because snowmobiles can travel is areas and create no environmental impact, they should be given more latitude rather than be confine to the RHV category.

Thank you for accepting these comment.

Sincerely Yours,

Don Hatch

Don Hatch
Executive Director

RESPONSE TO COMMENT LETTER 168 (DINALAND SNOWMOBILE CLUB, Hatch)

168-1 We are sorry you found the draft document difficult to interpret. The summary section immediately preceding the Table of Contents was intended to help the reader understand the document's format and ease in its review. To the extent practical, without losing the desired intent, the use of government "jargon" and scientific terms were kept to a minimum. The glossary has a complete list of abbreviations, key words and phrases used in this document and their definitions.

168-2 Please refer to our response 10-1.

168-3 We feel the proposed plan addresses a wide range of recreation uses on public lands in the resource area.

168-4 Please refer to our responses 10-1 and 70-1.

168-5 The reason for most restrictions to OHV use during winter months is to protect deer and elk on their crucial winter habitats. Impacts from snowmobile use in these areas are considered to be similar to wheeled OHV impacts relative to wildlife disturbance and displacement. In the proposed plan there are many areas in the resource area where snowmobiles can travel with no restrictions. At the elevations of crucial big game winter habitat, normally snow accumulations are low enough to prevent snowmobile use. However in winters of heavy snow accumulations, enhancing snowmobile use in these areas, are also winters of extreme stress to big game and snowmobile use would increase big game disturbance and displacement.

NOTE: An alternative proposal and petitions with approximately 560 signatures was submitted with Mr. Hatch's letter. The exact wording of the petition is:

In reference to the Diamond Mountain resource area RMP/EIS, we as concerned citizens of the Uintah Basin do not and will not support any of the alternatives as proposed in the RMP/EIS. Furthermore, we strongly recommend B.L.M. to continue with current management policy, ourselves maintaining that alternative A, the so called "No Action" alternative is simply a mere smoke screen which would enable B.L.M. to change management policy at any given time without regard to economical, social, and cultural impacts these changes would have on local citizens. Our deepest concerns are the nomination of the Dry Fork Red Mountain area as ACEC.

(revised)

THIS DOCUMENT IS SUBMITTED BY THE DINALAND SNOWMOBILE CLUB AND THE COALITION FOR RESPONSIBLE OHV USE. BOTH ORGANIZATIONS ARE LOCATED IN VERNAL, UTAH. ADDITIONAL SUPPORT IS, OR WILL BE FORTH-COMING FROM THE BLUE RIBBON COALITION, A NATIONAL ORGANIZATION FOR "SENSIBLE USE" OF PUBLIC LANDS.

SINCE THIS DOCUMENT HAS BEEN REVISED, WE NOTE AT A LATER DATE THAT THE TRAILING SYSTEM CREATED BY EXPERT BIKERS SHOW LITTLE OR NO EVIDENCE OF USE. THE TRAILING ESSENTIALLY FOLLOWS EXISTING GAME TRAILS. IMPACTS ARE ERASED ON AN ANNUAL BASIS BY NATURAL ELEMENTS OF WIND, WATER AND RAIN. EXCEPT FOR THE USERS -- THE EXPERT BIKERS -- NO ONE SEES NOR KNOWS OF THESE TRAILS. THIS IS A POSITIVE TESTIMONY FOR THEIR CONTINUED USE.

For the sake of brevity only, neither this proposal nor the petition signature sheets are duplicated in this document. They are available for public review in the Vernal District Office.

A proposal to allow continued OHV use of Red Mountain, to exclude it from RNA status, and to submit it as in-put for consideration toward the Diamond Mountain resource area RMP/EIS.

## Descriptive Location

Red Mountain is located nine miles north of Vernal, Utah. It falls adjacent to the Steinaker Reservoir boundary on the southeast, is bound on the west by the dirt Taylor Mountain road, and is adjacent on the north to the Chevron Resource, (Simplot) phosphate operation. It contains approximately 1972 acres. The location is unique because:

1. It is a recreational area close to Vernal.

2. The rugged physical features offers not only beauty and solitude, but is compatible with ORV travel on the already existing major trail and minor expert class RV trailings.

3. Non-discernible expert trails are generally confined to the east side; a single trail goes from the north rim to Taylor Mountain Road.

4. Outstanding geological features display brilliant red moenkopi formation in sharp constrast to shinarump mowrey sandstone. The Red Mountain summit contains ponderosa pine, but indications show harvest that took place in the late 1800s and early 1900s.

5. While the mountain is extensively used by RVs, hikers horses, and lately mountain bikes, the remainder of mountain is pristine in nature. While other trails have been used over the years, these do not show.

6. Evidence of displacements by man is manifest in tree stumps, poles shoring up the main trail; wagon tracks that are cut into the sandstone.

## Historical Past

When Ashley town was settled in the area north of Vernal in the late 1800s, much construction was necessary. Timber was hauled from the Ashley National Forest as well as posts from the south slopes of the Uintas. Wagon trails made patterns across, up and down these slopes; some can still be seen today.

But different from all of this was the unique and beautiful Red Mountain consisting of 1972 acres. Here was a source of close timber - the mighty ponderosa. Hence, a wagon road was laboriously carved from the southwest sector upward about two miles to the summit. A second and connecting road was constructed by hand, down the east slope, across ravens and along precarious, narrow sandstone slopes. Over this the pioneers pulled their wagons loaded with logs. Destination was Ashley town where building was taking place.

Soon the sensibility of hauling timber from Red Mountain waned. The better trees were gone and what few remained were not worth the effort.

But a use pattern was set. Families from Vernal still visited the area by horseback, hiking and with old model ford cars. The same old wagon trail was used since it was the only trail and the only way to get up and back. Occasionally entire wagons full of kids frequented the mountain -- the young and the old. To this day the pattern continues except access, instead of by wagon, is by OHVs, hiking and again, horses. So we have had, over a period of about seventy years, an established and non-conflicting type of recreational use.

We do not want this use pattern to change. Additionally, other OHV trails are used with <u>no apparent impact</u> on Red Mountain proper. There is ample evidence that the area has, in fact <u>rejuvenated</u> from a period of intense use and construction to it's present condition of a most pleasant place and an <u>all around</u>, diversified recreation area. To re-designate or to "fix it when it works" idea, does not make sense. <u>Management</u>, <u>not</u> <u>closure</u> to the many recreational opportunities, is the answer.

## ENVIRONMENTAL IMPACT

Since Red Mountain is a remnant of the Uinta Mountain system, and it's prominence is the result of hard Shinarup formation protecting the red moenkopi, the resulting system is striking in that it all stands alone to the south of the main range. The tough exterior offers little chance for tender, perennial plant growth... Likewise, growth is not possible for many of these kinds of plants because of a lack of water. Therefor, ORV travel is possible with minimum or no impact. It also should be noted that "No endangered, threatened or sensitive animal species are known to occur on Red Mountain", according to J. S. Tuly, "Red Mountain Research Natural Area". Animal displacement is minimal or non-existent since there is no sustaining water, and a lack of dependable food.

Of significance is the fact that the Shinarup formation is greatly exposed, especially along the southeast slopes. Along the upper stretches it provides a hard surface that shows little or no impact from R.V.s. Other than the main trail, no impact from R.V.s is found because of the hard surfaced terrain even though other trails and areas are used. It is recommended that this use continue, but certainly monitoring for damage should be in order.

The present rough trail systems make it possible for one to leave the trails and hike to various spur areas which over-look the gulleys and draws. The panorama is breath-taking to both the north and west. To the east and southeast, a rugged and expert RV set of trails are offered on the slick Shinarup sandstone. There is little or no evidence of these trails because of annual weather cleansing. One would say that nature's natural elements, wind, water, rain, ice and snow re-arranges the landscape and keeps it in a natural form by obliterating tracks left by animals and RVs alike...Finally, the trail systems provide a <u>wide range</u> of human recreational needs for both the expert, the young, the old, handicapped and even the blind. This is and can be a place for <u>everyone</u> with each finding his or her degree of solitude considering diversity of areas.

To further substantiate the above claims, I again quote the J. S. Tuhy study wherein he states, "Soils appear to be shallow and considerable bare sandstone is exposed in many of the locations beneath the pine". This barren condition is even more pronounced over the entire surface of Red Mountain except to the extreme south. From the above we can conclude that ORV's have little or no impact on Red Mountain. Because of this, and the fact that more people can enjoy Red Red Mountain when it is not designated (43 CFR 8223), or locked in to the present proposed management plan, leads to the belief that Red Mountain should remain used <u>as is</u>.

## Recreational and Economic Needs

At the present time, Red Mountain's biggest asset is recreation. Management should point to this and allow a wide and diversified kind of recreational activities. Considering the area, a great variety of recreational activities are possible. In this respect the mountain is uniquely different from most. There is no reason that hiking, biking, picnicing, ORV use, horseback riding, can't all exist side by side in this fine area. As mentioned, the variety of trails makes it possible to find solitude as well as experience group education and instructive activities. Few places can afford this. Red Mountain can.

The State of Utah is in an economic crisis, and particularly is it shown in Vernal, Utah. Because the extraction industries are now dormant, recreation comes to the fore-front as a viable economic factor. Recreation is big business, for it affords over 2 billion dollars to Utah's annual economy... The industry is the fastest growing, and ranks second in the State (Utah Travel Council, 1986). Red Mountain can become a part of this industry with careful and sensitive management -- management which will suffice rather than closures and limitations.

J. S. Tuhy suggests in his paper of March 17th, 1987, that the resources of Red Mountain are probably insignificant to the social and economic bases of Uintah County. RNA/ACEC designation should have not effect, positive or negative, on revenue". THIS COULDN'T BE FARTHER FROM THE TRUTH!!. The same might be said about river trips in this area that now bring over 2 million dollars annually to this area's economy. Recreation? Yes. It continues to amaze me how Mr.Tuhy's (Nature Conservancy)single trip on foot on to Red Mountain, has lead him to so many conclusion -- all supporting a single biased view. He may have spent a week or two; natives here have spent a lifetime of use and study.

TO-BLM
VERNAL DISTRICT OFFICE
170S. 500E
VERNAL UT. 84078

FROM-
UTAH FOUR WHEEL DRIVE
ASSOCIATION INC.
WESTON DAVIDSON
LAND USE OFFICER
375S. 100E
LOGAN UTAH 84321
750-2534 W
753-8521 H

RESPONSE TO BLM DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT, DIAMOND MOUNTAIN RESOURCE AREA.
1616.10

DEAR SIRS,
WE HAVE FOLLOWED THIS PROCESS FOR SOME TIME, OUR FEELINGS THAT LOCAL PEOPLE SHOULD MAKE THE DECISIONS AFFECTING THE LAND AROUND THEM HAVE LIMITED OUR RESPONSE UNTIL THIS STAGE.

HOWEVER DUE TO REQUESTS AND COMUNICATIONS WITH THE PEOPLE LIVING WITHIN THE AREA, REQUESTS FROM PEOPLE FROM THE AREA, OUR EXPERIENCE WITH REGULATION IN OTHER PARTS OF THE STATE, AND OUR RECREATIONAL USE OF THE AREA, WE MUST NOW ENTER THE DEBATE.

-THIS RESPONSE IS AIMED AT INFORMING THE BLM, AND OTHER DECISION MAKERS OF THE CONCERNES OF CERTAIN LONG-ESTABLISHED USER GROUPS. INCLUDING BUT NOT LIMITED TO; 4 WHEEL DRIVE, MOTORCYCLE, ATV, & SNOWMOBILE USERS,ETC. WHO USE MOTORIZED OR OTHER VEHICLES FOR PERSONAL RECREATION, EXPLORATION, HOBBIES, AS WELL AS OCCUPATIONAL REASONS AND COMMERCIAL PURPOSES.

WE ARE ALSO MEMBERS OF UNITED 4WD ASSOC. AND THE BLUE RIBBON COALITION, THIS RESPONSE WILL BE CONSIDERED AS REPRESENTING THOSE GROUPS AND THEIR MEMBERS AS WELL.

IN GENERAL THOSE PEOPLE WHO HAVE ENJOYED ACCESS TO COMMONLY HELD LANDS BY WHATEVER MODE OF TRANSPORTATION HAS BEEN NORMAL AND CUSTOMARY FOR THE TIME AND ACTIVITY.

-DUE TO POPULATION GROWTH IN THE REGION AND EXTENSIVE LAND CLOSURES AND REGULATION IN OTHER AREAS, THE VALUE OF ACCESS TO LAND WITHIN THE STUDY AREA IS PROJECTED TO INCREASE OVER THE LIFE OF THIS RMP.
ALSO FUNDS DUE TO STATE AND FEDERAL OHV AND TRAIL ACTS WILL CONTINUE TO INCREASE. THESE FACTORS WERE NOT APPEARANT AT THE BEGINING OF THIS PLANNING PROCESS AND MUST BE ADDRESSED BOTH IN THIS MANAGEMENT PLAN AND IN FUTURE BUDGET REQUESTS.

THE SINGLE FORM OF RECREATION WHICH STANDS OUT AS BEING UNIQUE TO BLM LANDS AND UNAVAILABLE ELSEWHERE. IS THE OPPORTUNITY TO EXPLORE AND DISCOVER THE LAND AND WHAT IT HOLDS.

EACH PERSON NEEDS THE OPORTUNITY TO DISCOVER FOR HIM OR HER SELF THE BEAUTY OF THE LAND, IF THEY ARE TO DEVELOPE AN APRECIATION OF IT.
THIS IS A NEED WHICH THE BLM LANDS ARE UNIQUELY ABLE TO FULLFILL, AS THESE LAND HAVE BEEN OPEN TO TRAVEL BY WHATEVER MEANS NORMAL AND CUSTOMARY FOR THE TIME.
THE BLM HAS ENCOURAGED THIS AND WE LOOK FORWARD TO MANY MORE YEARS OF ENJOYING THESE OPPORTUNITIES.

169-1 WE MUST ASK THAT A PROCEDURE, LIKE THAT OF THE FOREST SERVICE, BE INCLUDED IN THIS PLAN AS APROVED, FOR CREATING TRAVEL PLANS TO REGULATE ANY AREA DESIGNATED AS AN EXISTING TRAIL OR DESIGNATED ROUTE AREA.
THE LACK OF PROCEDURE TO ALLOW INTENSE PUBLIC INPUT OR THE FAILURE TO FOLLOW ONE ONCE IN PLACE. WILL RESULT IN CONFLICT AND TIME AND MONEY EXPENSE ALL OUT OF PROPORTION TO THE SAVINGS RESULTING FROM ADMINISTRATIVELY CREATING THOSE PLANS.

WE HAVE REVEWED THE DRAFT MANAGEMENT PLAN AND MADE SOME RECOMENDATIONS. WE ASK THAT THEY BE CONSIDERED.

THE RANKING OF ALTERNATIVES FOLLOWING IS PREDICTABLE, WE WILL ASK FOR THE MOST ACCESS POSSIBLE.

FIRST CHOICE WOULD BE A FORM OF "D" MORE PROTECTIVE OF SOME CRITICAL OR FRAGILE SITES OR A LESS RESTRICTIVE FORM OF "E" OR "A" ALL AREAS HAVE TOO LONG AND EXTENSIVE OF SEASONAL RESTRICTIONS.

"D" SECOND
"A" THIRD
"E" FOURTH
"B" AND "C" NOT ADVISED AS LOST USES OUTWEIGH POTENTIAL BENEFITS AS WRITTEN

169-2 -WE COULD NOT HELP BUT NOTICE THE EXTREME RANGE OF OHV POSSIBILITIES AVAILABLE IN THE DIFFERENT ALTERNATIVES. THIS INDICATES TO US THAT SIGNIFICANT IMPAIRMENT OF OTHER USES IS NOT EXPECTED AS A RESULT OF OHV USE WITHIN THE DMRA.

-THUS WE LOOK FORWARD TO OPEN AND LIBERAL OHV OPPORTUNITIES IN THE FINAL MANAGEMENT PLAN. OUR PREFERENCE WOULD BE AS CLOSE TO "D" AS POSSIBLE AS NOTED.

169-3 - THE UNIFORMITY OF AUM AVAILABILITY FOR GRAZING ACCROSS THE SPECTRUM OF ALTERNATIVES IS ALSO A QUESTION. ESPECIALY AS REGARDS "C" WITH THE RESRTICTIONS ON OTHER USERS AND NO AUM CHANGE.

169-4 THE LAST SECTION OF THIS REPLY IS A LIST OF PREFERED ALTERNATIVES SELECTED FROM THE DIFFERENT ALTERNATIVES.

-THE BODY OF THIS RESPONSE IS ORGANIZED ALONG THE SAME THEMES

RESPONSE TO COMMENT LETTER 169 (UTAH FOUR WHEEL DRIVE ASSOCIATION, INC., Davidson)

169-1 An important part of the RMP process is the development of a travel plan for the resource area. The RMP will include a map identifying all public land in the resource area as being either open, limited, or closed to OHV use. This same map will show roads that will be designated as travel routes during periods of limited use. After the RMP is completed, a larger scale map will be published that will be used as the official resource area travel map.

169-2 The wide range of OHV opportunities in the draft was for analysis purposes. The proposed plan offers a level of OHV use somewhere between the two extremes.

169-3 Alternative B, livestock closures were recommended on municipal watersheds, riparian areas, T&E habitat, and bighorn sheep reintroduction areas. Also to accommodate an increase in wildlife use, livestock reductions would be necessary due to minimal rangeland treatments proposed in this alternative. A 25,292-AUM loss for livestock was analyzed in Chapter 4 but was not shown as an initial reduction in Chapter 2. This has been corrected and now reads: "Establish livestock grazing preference at 25,007 AUMs." The remaining alternatives and the proposed plan would remain initially at 50,299 AUMs due to no initial complete closures affecting existing use. Possible future reductions to livestock from livestock/wildlife conflicts for forage in crucial wildlife habitat could be mitigated by rangeland treatments and management practices. Any AUM losses to livestock due to negotiation to eliminate domestic sheep from proposed bighorn sheep reintroduction areas would occur over time and be done voluntarily by grazing operators through change in class of livestock and alternative grazing systems.

169-4 Thank you for your comments and suggestions.

NOTE: The remainder of Mr. Davidson's comments presents an alternative proposal, selected from the alternatives presented in the draft document. For the sake of brevity only, this proposal is not duplicated in this document. It is available for public review in the Vernal District Office.

169-4 Cont AS THE BLM DRAFT DOCUMENT.

-ATV/OHV/4WD AREAS; WE SUPPORT PROPOSALS TO PROVIDE ATV/OHV/4WD INTENSIVE USE AREAS IN CONVENIENT PROXIMITY TO SERVICES.
THESE AREAS PROVIDE AREAS TO TRAIN YOUNG RIDERS AND PROVIDE IMPORTANT SOURCES OF RECREATION IF SIMPLE OPERATION OF A VEHICLE OR A FAMILY OR GROUP OUTING IS PLANNED.

-PLANNING CRITERIA
-OVERALL CONSIDERATIONS
THE SUCCESS OF THIS PLAN DEPENDS ON THE FAIR AND EQUITABLE APPLICATION OF THESE CRITERIA AND RECOGNITION OF EXISTING RIGHTS AS ENJOYED BY LAND USERS, WHETHER PAST REGULATORY ACTIONS HAVE RESULTED IN SPECIFIC PERMITS AND RESTRICTIONS/RECOGNITION OF THOSE RIGHTS OR NOT.

-SPECIAL MANAGEMENT AREAS
WE AGREE THAT CERTAIN AREAS ARE BY THEIR NATURE DESERVING OF DIFFERENT MANAGEMENT OF CARE OR USE. IT IS OUR ADVISE THAT THESE AREAS ONLY BE DESIGNATED AFTER DUE CONSIDERATION AND THAT THE NUMBER AND SIZE OF THESE AREAS BE AS SMALL AS POSSIBLE TO MINIMIZE DAMAGE TO AND/OR LOSS OF RESOURCES OR VALUES DUE TO MISAPPLICATION OF SPECIAL PRESCIPIONS OR RESTRICTIONS, SUCH AS CHAINING, BURNING, ROAD OBLITERATION AND REMOVAL OF HISTORICAL FEATURES IN THE NAME OF RECLAMATION.

-RESOURCE AVAILABILITY AND ACCESSIBILITY
AS THIS IS OUR PRIMARY CONCERN, IN THIS RESPONSE WE WILL ADDRESS THIS ISSUE UNDER THE APPROPRIATE SECTIONS AND HEADINGS.

-BUDGETS; AS THE BUDGET OF THE BLM IS GOING TO BE USED AS A CRITERIA FOR SELECTION OF MANAGEMENT PRIORITIES, THE REALLOCATION OF BUDGETARY MONIES TO IMPLEMENT AND ADMINISTER THIS RMP MUST BE SUBMITTED TO THE SAME CAREFUL CONSIDERATION AND PUBLIC INPUT AS ANY OTHER FACTOR GOING INTO THESE DECISIONS, AS MUST FUTURE BUDGET REQUESTS.

-CULTURAL AND PALEONTOLOGICAL RESOURCE MANAGEMENT
THOSE FEATURES AND ARTIFACTS OF THE PAST 150 YEARS ARE OFTEN GIVEN TOO LOW A PRIORITY, OFTEN RESULTING IN THEIR "RECLAMATION" AND SUBSEQUENT LOSS.
ALSO TOO LARGE A BUFFER ZONE AROUND AREAS OF INTEREST WILL ADVERSELY AFFECT OTHER RESOURCES AND USES, AND MAKE IT DIFFICULT TO MANAGE THE RESOURCE BEING PROTECTED.

-FIRE MANAGEMENT
COSTS OF FIRE SUPRESSION WILL INCREASE IN DIRECT PROPORTION TO REDUCTION OF ACCESS TO AN AREA. THIS MAY RESULT IN LARGER AREAS BEING BURNED. ALSO BEFORE/AFTER EFFECTS OF FIRES WILL BE GREATER DUE TO MOVEMENT OF FIREFIGHTING PERSONEL AND EQUIPMENT. THESE FACTORS AS WELL AS OTHER EFFECTS MUST BE

=VISUAL
ALTERNATIVE "A" ALLOW SEMI-PRIMITIVE ACCESS ROUTES ETC, TO ALLOW DESPERSION OF USE AND EXPLORATION BY CASUAL USERS ETC.

=WOODLANDS
=PRODUCTIVE PINYON-JUNIPER, USE SUSTAINED YEILD EXCEPT IN TREATMENT AREAS, MANAGE TO CREAT SUSTAINED FENCE POST YEILD CLEAR/ REPLANT IF NECCESSARY.

=CONIFERS, ASPEN, PINE, USE SUSTAINED YEILD,OR COORDINATE WITH OTHER MANAGEMENT PRIORITIES, PLANT AS PART OF RIPZONE TREATMENT, REPLANT AS NEEDED, SALVAGE DEADWOOD AS, CREATE SOME ECONOMIC VALUE IF POSSIBLE.

=700,000 ACRES USABLE FOR GATHERING, HARVESTING, CO-ORDINATE WITH OTHER MANAGEMENT GOALS IF POSSIBLE, TREATMENT AREAS SHOULD BE OPEN FOR PLANT SALVAGE.

== THANK YOU FOR THE OPPORTUNITY TO RESPOND TO THIS WELL-DONE DRAFT DOCUMENT.

Weston
Davidson
UT 4WD Assoc. Inc.

March 28 1992

Penelope Smalley, Team leader
BLM

Some comments pertaining to the Ruple Cabin alotment.

170-1 4.23 In reflecting the economic value to the community. You should include more than just the feed put into a.u.m. values. You should include everything involved, the value of the cow, investment in private lands. Because private and public lands are economically tied together. With out each other they are not an economical unit. Just the Uintah Basin Grazing Asso. alone puts more into the local economy than you have stated in the report.

May we suggest that you get help from professional economist, USU, or county agents who understand agricultural economics, to more fairly represent agriculture interests.

Also the visitor days seem over stated in value and numbers, for this report they should be tied only to BLM land users.

170-2 A2.6 On Ruple Cabin alotment the livestock aums have been voluntarily reduced to improve range conditions. But the increase in wildlife has more than filled in for those previously used by livestock. The proposed wildlife aums are to be more than double. We think this is extreme and puts to much pressure on the private land owners. While not doing enough on public lands to produce aums needed for public wild life.

The wild life going between Colorado and Utah needs monitered better. It isn't unusal for us to have 300 to 400 elk in just one day on the Ruple Cabin lands. While there should be only 390 wild life aums total.

170-3 We would also object to any new wild life species being introduced without permission of private land owners impacted.

Due to the volume of this draft, we may have missed something, we would like to be able to respond more in the future.

With Uintah Basin Grazing Asso.

Lynn Burton

## RESPONSE TO COMMENT LETTER 170 (BURTON)

170-1 Please refer to our response 104-2.

170-2 We agree with your concern that sufficient forage be present to support objective levels of wildlife as requested by UDWR. We have planned approximately 300 acres of new sagebrush treatment within the allotment (refer to Appendix 8). We would also continue to maintain the more than 3,300 acres of previously treated sagebrush as per the agreement signed in 1988 between the UBGA, UDWR, SCS, and BLM. Vegetation monitoring would determine if objective levels could be met once all improvement work was completed.

170-3 Private landowners would be involved in any reintroduction of wildlife species to resolve issues prior to releasing wildlife.

Vernal, UT 84078
March 29, 1992

Jean Sinclear
Bureau of Land Management
Vernal District Office
170 S. 500 E.
Vernal, UT 84078

Dear Ms. Sinclear

171-1 I am opposed to any development of the Bear Hollow/Mame's Hole areas.

These areas should not be destroyed by building new roads up and over Mame's Hole. This will bring pollution and trash to this beautiful area.

These roads will also destroy the natural habitat of the wildlife which live in the mountain meadow environment.

Sincerely

Berkley Jesse Hall Jr.

RESPONSE TO COMMENT LETTER 171 (HALL)

171-1 Thank you for expressing your concerns. Please refer to our responses 12-1 and 53-1.

March 31, 1992

Jean Sinclear
DMRMP Team Leader
Bureau of Land Management, Vernal District
170 South 500 East
Vernal, UT 84078

Dear Jean:

I am writing to express my appreciation for the fine job you and your staff have done on the Draft Diamond Mountain Resource Management Plan, and particularly on Alternative E. I admit I've had time only to scratch the surface of the draft, but the parts I've read show that BLM is making the effort to provide for truly multiple uses—and fewer abuses. The volume as a whole must be equally good, for Will Durant doesn't pass out compliments lightly!

My special concern is for the slickrock/red rock area between Steinaker and Red Mountain. When I worked and lived in Dinosaur National Monument I labored under the naive belief that any scenery worth seeing was in the monument. After moving into Vernal and exploring its environs more, I saw how wrong I had been. Moonshine Arch and the steep Navajo Sandstone slopes around it are like a little piece of classic southern Utah canyon country transplanted right into our back yard. A little farther north and east, in the strike valley along the south slope of Red Mountain, there is an area of numerous pillars and small windows eroded in red sandstone. This latter area seems relatively unknown and undisturbed—I'm not sure what the land status is—and offers superb opportunities for hiking and solitude.

172-1

The Moonshine Arch area, in contrast, seems rather too well-known to a few ORV-users, vandals, and litterers, yet many other people who appreciate outstanding natural scenery have been unaware of it. It deserves much better, starting with physical barriers to vehicle access. Designation as a "primitive recreation site" of some sort, with encouragement of hiking and other non-motorized use, would be ideal protection. There may also be a potential for a mountain bike trail in the area, utilizing parts of the slickrock and the existing roads at the foot of the slickrock. Both hikers and bike riders would need to be educated to stay off fragile cryptogamic soils. Such protection, minimal trail development, and some interpretation could ultimately be linked with the Flaming Gorge-Uintas Scenic Byway Development Plan.

Thank you for taking the time to read my (and, I hope, many others') comments. Keep up the good work!

Sincerely,

Linda West

Linda West
764 West 500 South
Vernal, UT 84078

## RESPONSE TO COMMENT LETTER 172 (WEST)

172-1 Please refer to our responses 70-1 and 79-2.

1671 North 3996 West
Vernal, Utah 84078
March 30, 1992

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

Dear Jean,

As a member of the Grant L. Hacking Partnership who owns Mame's Hole and Bear Hollow, I am greatly concerned as to the proposed plans for these areas. I appreciate the care that the Bureau gives to the land but do not feel that the proposals for the above mentioned areas are necessary.

As I was listening to a news report on the American farmers and how they have always been the backbone of this nation and yet are quickly being driven out of business, I thought about what is happening now with our own land. My father has always taken great care to manage his private land in Mame's Hole and Bear Hollow for the benefit of the wildlife as well as his cattle. He has tried to preserve the natural state of the land and plant life also.

174-1 I oppose the creation of a road from Mame's Hole over into Lambson Draw because of the disturbance of the ecosystem and the possibility of fence cutting, trash, off road vehicle damage and danger to the cattle. I cannot see that the expense that this road would create would be worth the benefit of being built. It would take acreage from my dad who has paid many taxes which goes back into the community and take away feed for his cattle.

174-2 I am also opposed to the burn proposal without knowing specifically where the burn is to take place. My grandfather tried it many years ago and after a two year wait tried burning and the wind shifted and burned many acres that shouldn't have been.

174-3 The building of a campsite in Bear Hollow is absolutely unnecessary. How is the BLM going to patrol this area to keep the public from trespassing and desecrating the private land surrounding it. Has the expense of building this campsite been considered when there is a public campsite located at Matt Warner reservoir a few miles down the road.

I am opposed to all of these proposals because they are catering to the recreation side of our society and not the concerns of the tax paying farmers who are the food producers of this nation. Who is going to take care of this land and produce meat for people if little bits and chunks of it are continually opened up to the public. This affects not only the cattlemen but the fragile balance of the plantlife and the wildlife. We need to leave some of this area untouched by further development.

## RESPONSE TO COMMENT LETTER 174 (HALL)

174-1 Thank you for expressing your concerns. Please refer to our response 12-1.

174-2 Please refer to our response 68-2.

174-3 Please refer to our response 53-1.

174-4 I am opposed to any development and increase in wildlife in the Mame's Hole and Bear Hollow area.

Sincerely,

Barbara H. Hall

Barbara H. Hall

174-4 Please refer to our response 53-3.

Conservation Issues Committee
134 West Main
Vernal, UT 84078

March 26, 1992

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

SUBJECT: Draft Environmental Impact Statement for the Diamond Mountain Resource Management Plan.

Dear Ms. Smalley:

After thorough study and discussion of your Draft EIS for the Diamond Mountain Resource Management Plan, we have made the decision to support Alternative E as the best alternative of the five presented for our consideration in the draft document.

It should be noted that although we support Alternative E a the best for the five alternatives, there are some modifications that we feel should be made in your proposed alternative before it is finalized.

It is important for BLM to realize that the economic future of the Vernal area will depend upon several, often conflicting, uses of the natural resources found on public lands. While much of our economic success, past and future, is linked to hydrocarbon and mineral extraction, there is a growing awareness that recreation and "quality of life" will pay an increasingly important part in the generation of revenues and livelihoods in Northeast Utah. The importance of natural resources that we may refer to as "amenities"--clean air and water, scenic vistas, the consumptive and nonconsumptive enjoyment of wildlife, the extraordinary cultural and paleontological resources, and a wide variety of recreational opportunities--cannot be overstated. It is the maintenance of these resources that enhances the quality of life for current Uintah Basin residents and that will also draw individuals and businesses to our area in the future.

A "full investment portfolio" for the future will include both protection of these "amenities" and preservation of environmental values, as well as the timely and beneficial use of renewable and non-renewable commodity resources on the public lands. In large measure, we depend upon the Bureau of Land Management for guidance and cooperation in planning a healthy economic future for the

Vernal area. The partnership that has existed between BLM and the Vernal Area Chamber of Commerce must continue, and we look forward to working with you in implementing a Diamond Mountain Resource Management plan that will be beneficial to all our Citizens.

What follows are specific observations and suggestions for improving the final form of Alternative E:

175-1 1. The Draft EIS seems to be comprehensive and well-researched. Alternative E appears reasonable in the balance it attempts to strike between resource use and environmental protection.

175-2 2. A very positive aspect of the Draft EIS is its emphasis on riparian areas, rangeland improvements, and the protection and enhancement of scenic and recreational areas.

175-3 3. The Draft EIS places emphasis on the appropriate exchange and transfer of lands between BLM and private individuals where improvement of management would result and where all citizens would benefit. It also allows for the timely and appropriate transfer of lands to municipalities and to the county in cases where these lands would be essential for the continued growth and benefit of the community.

175-4 4. It allows necessary water development, new communications sites, and essential right-of-ways with adequate safeguards and restrictions.

175-5 5. "Protection zones" should be established around valuable and high-sensitivity archaeologic and paleontologic sites. While these zones may not prevent vandalism, they may help to avert damage by casual visitation. More interpretive facilities should be provided for the education of the public on these sites. Such facilities may actually encourage the public to help BLM protect sensitive sites in well-travelled areas. BLM must also give more emphasis to enforcement of those regulations for the public lands which protect unique and sensitive, "one-of-a-kind" sites.

175-6 6. There appears to be no difference between alternatives concerning the development of potential commercial phosphate deposits in the Red Mountain-Ashley Creek area. The high scenic quality of this area and the crucial wildlife habitat found there cause some ambivalence about the wisdom of allowing another full-scale phosphate mine in the foreseeable future. Most of the Chevron phosphate mine has not been adequately reclaimed, and until reclamation has proceeded further it may not be wise to allow the magnitude of surface disturbance you foresee with full scale development of the resource.

175-7 7. Considering the expanse of public lands now open to OHV use, it may be good management to restrict OHV use in riparian areas, areas of highly erodible soils, critical soils and floodplains, cultural and archaeological protection zones, and areas with semi-primitive, non-motorized values. This would provide adequate

RESPONSE TO COMMENT LETTER 175 (VERNAL CHAMBER OF COMMERCE, CONSERVATION ISSUES COMMITTEE, Perry)

175-1 Thank you for your comment.

175-2 Again, thanks.

175-3 Thank you for your support.

175-4 Thank you.

175-5 BLM will continue to emphasize protection and interpretation of both paleontological and archeological resources as well as enforce existing laws dealing with disturbance and removal of these important resources.

175-6 Please refer to our response 113-1.

175-7 The limitations you recommend are being included in the proposed plan. We recognize the importance of the Moonshine Arch area and the need to develop a management plan that will protect the area.

175-7
Cont.

protection to sensitive areas, and more diversity in the recreation spectrum on BLM lands. Specifically, the extraordinary area known as Moonshine Arch, located north of Steinaker, has undergone marked degradation and scenic damage is occurring or has occurred to the slickrock.

Thank you for the opportunity to comment on this Draft EIS. We appreciate the hard work that has gone into bringing this document to the public in its current form, and we look forward to sharing with you in the wise management of our public lands in years to come.

Best regards,

P.S. Please understand these comments are made by the Conservation Issues Committee of the Chamber and do not necessarily represent the opinion of the Chamber Board of Directors or the Chamber membership as a whole. The Board of Directors has asked each committee to prepare its own ideas and suggestions where it feels it appropriate.

March 30, 1992

Penelope Smalley
Bureau of Land Mangement
Vernal District
170 South East
Vernal, Utah 84078

Attention: Penelope Smalley

We have reviewed the Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement and tried to understand it. We are concerned about the 'take from livestock - give to wildlife' impression we get.

We believe the BLM has a good track record in managing or monitoring our allotment (Little Hole). According to our figures and yours, we run 1 cow to 96.5 acres from June to October. This is a high acre per cow ratio.

176-1 For 11 years we have used Taylor Flat allotment to help manage the Little Hole and delay the use of the grass for 30 days. On page A8.40, the Little Hole is listed in unsatisfactory condition. We disagree.

We have built several reservoirs to improve cattle distribution and recently proposed a pipeline. We realize water holes and wet meadows can be overgrazed, but by using Taylor Flat, we have observed, as we gather and move cattle, an overall improvement in the Little Hole.

176-2 The chart on A2.6 shows you want to double the wildlife AUM in the Little Hole and the same chart says the current resident deer population is 44. We believe this is a low figure, but believe wildlife and livestock AUM could be significantly increased with juniper and pinion control. (through controlled burning)

176-3 Page 4.60 shows that 9,000AUM will result in $11,500 yearly loss to the local livestock industry. This is incorrect.

176-4 Referring to page 4.59, we would like to comment that firewood is and important resource. Dead and down trees and dead-standing trees should be harvested.

176-5 On page 4.56, we believe the black-footed ferret transplants put too many restrictions on the multiple use system.

176-6 On page 4.16, Gov. Norman Bangerter is used as a reference and we don't feel he has an expertise in this area and his comments should not be taken as fact.

176-7 On page A7.12, Gorge Creek is listed as being 17 miles long. This is incorrect. It is closer to four miles and two of those miles are on private ground. We know of only 3 places livestock can drink out of Gorge Creek. They can not trail up it or down it. We feel that Gorge Creek should definitely not be a riparian or wild and scenic river system concern.

176-8 On page A7.14, Little Davonport Creek is listed as the headwaters being in confluence with Gorge Creek. This is incorrect.

176-9 We are opposed to the closing of riparian areas to livestock grazing. These areas can be managed! (see page 2.54)

176-10 On page A8.40, the Little Hole is listed as a riparian concern. Why? We would like this clarified.

176-11 Referring to page 2.30, we are concerned about the Wild and Scenic River Act. There are too many restrictions that affect the use of natural resources. It infringes on private property rights.

## RESPONSE TO COMMENT LETTER 176 (HUNTING)

176-1 The Little Hole Allotment was listed in unsatisfactory condition in error; it has been changed to show satisfactory condition.

176-2 One thousand (1,000) acres of closed stands of pinyon-juniper are proposed to be burned and seeded in the Little Hole Allotment. Please refer to Table A8-4. The 44 deer is an estimate of deer numbers on public lands only. This may account for the differences we estimate and the number you have observed.

176-3 Please refer to our response 104-2.

176-4 It is our opinion that cutting cottonwoods adjacent to the Green River (including dead and down) would not be compatible with protecting riparian or wild and scenic river values. Such trees also provide valuable perching and possible nest sites for numerous bird and small animal species. There are many areas in the resource area where dead and down pinyon and juniper firewood can be harvested.

176-5 All black-footed ferret reintroductions would be classified as "experimental nonessential" which allows for management flexibility to assure the reintroduction would not significantly impact existing or future land uses on public lands. All proposed restrictions have originated from draft USF&WS guidelines intended to ensure a successful reintroduction. We have also recommended no changes to current authorized permits or leases in areas where black-footed ferrets are proposed for reintroduction. We believe this does not restrict multiple use.

176-6 The reference to Governor Bangerter has been corrected to USF&WS, 1985. Please refer to the reference section of the document for the complete citation.

176-7 Gorge Creek was listed as 17 miles in length in error, the correction has been made to read 1.7 miles. Although Gorge Creek is inaccessible for the most part, it is considered a riparian area because it exhibits riparian vegetation. Gorge Creek was inventoried and placed in a late seral stage of ecological condition; however, the lower end next to the Green River is below its potential. Gorge Creek was determined to be non-eligible for further consideration in the national wild and scenic river system. (Please refer to Appendix 7.)

176-8 Thank you for the correction, the change has been made to the text.

176-9 Please refer to our response 92-9.

176-12 We are opposed to the acquisition of private land by federal or state agencies. (page 2.11)

176-13 We are opposed to the closing of bear baiting. (page 2.35)

176-14 After reviewing this document we feel that none of these alternatives are acceptable without serious revision. As private land owners and permittees, who are concerned, who use, know and improve the natural resources, we feel we, and others like us should have more imput on the direction of this management plan.

There are many other comments we would like to make but they are not specific to our main concern.

Sincerely,

Ray Hunting

Marilyn Hunting

Rayma McCarrel

Scott McCarrel

176-10 Little Hole Allotment is listed as a riparian concern due to the increasing presence of noxious weeds, primarily whitetop, along the banks of the Green River. Riparian conditions are far below potential where livestock can easily access the river and livestock can be a conflict with float boaters.

176-11 Please refer to our response 30-1. Managing a river corridor to protect wild and scenic values could, at times, limit some types of uses in the river corridor. Private property rights would not be affected.

176-12 Thank you for expressing your concerns. Any transfers of land ownership involving private land would be on a willing seller or willing giver basis.

176-13 Please refer to our comment 114-34.

176-14 Thank you for your comment.

Brent Hansen, CPA
P O Box 263
Vernal, Utah 84078

March 31, 1992

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

RE: Diamond Mountain Resource Management Plan

Dear Ms. Smalley:

I support alternative E. But, some improvements need to be done to that alternative before it is acceptable. Alternatives C and D are inconsistent with balanced management as required by the Federal Land Policy and Management Act because of their emphasis on livestock and minerals over other resources. Alternate A is the status quo which is unacceptable because management practices and values have changed since the previous plan was adopted.

I support the Uintah Mountain Club's proposed changes for alternative E. Their suggestions provide better protection of the resources and a better definition of multiple use. You can not use all lands for all uses. Some uses preclude other uses so there has to be an understanding that some lands will be limited to certain uses. Multiple use means that the needs of all users will be met.

177-1 How can you claim that you have a balanced alternative when you will allow livestock grazing on 99% of the land and leasable mineral activities on 90% of land and open the other 10% with no surface rights (page 2.30)? Only 1% is closed to grazing and zero is closed to mining. Multiple use and a balanced plan require that these percentages be decreased.

You have not included enough land under the level 1 and 2 classifications. There is definitely more than 1% of level 1 land in this management area. And, because of all the critical wildlife winter range and archaeological sites within this area, the level 2 acreage is understated. You need to provide more protection to a larger percentage of the land in this plan.

177-2 Phosphate mining should not be permitted in the Red Mountain-Ashley Creek area. This land has high scenic value and is critical/crucial winter range for deer and elk. You did not provide

## RESPONSE TO COMMENT LETTER 177 (HANSEN)

177-1 Please refer to our response 61-1. The multiple use concept does not require multiple use on every acre nor does a balanced plan require a more even split of the management levels. We attempted to use the priority management area concept and assigned resource values to the specific management levels consistent with the overall management objectives for the proposed plan and each alternative.

177-2 Please refer to our response 61-2.

Diamond Mtn Resource Mgt Plan -- March 31, 1992 -- page 2

177-2 Cont. a broad range of management direction on this issue because all of your options allow phosphate mining.

177-3 More protection of the slickrock area north of Steinaker Reservoir is needed. This scenic area needs to be protected. It should be closed to OHV use. You should actively work to acquire section 16 in the Red Mountain Area for improved management of this area.

177-4 Protection zones need to be established around important and sensitive archaeological and paleontological sites which limit or restrict surface disturbing activities. More survey and enforcement activities are needed to protect these resources on public lands.

177-5 The lands in Diamond Breaks and West Cold Springs WSA's need to be placed in the Browns Park Complex ACEC should either of these not receive Wilderness designation.

177-6 I support Wild and Scenic Status for the Upper and Lower Green Rivers. I have on both stretches and they both qualify for this special designation.

177-7 Too much of the area in alternative E is open to OHV use. 84% with no or seasonal restrictions does not equal a balanced plan. Especially when only 6% is closed to OHV use (excluding any roads within that 6%). As a minimun alternative B should be implemented on this portion of the plan.

177-8 The riparian protection zones are too narrow at 330 feet. They should be twice this width. The experiment on Salt Creek in Wyoming where a stream was created where there was no stream showed that the surrounding vegetation will create raparian habitat if it is properly managed. Livestock grazing in these extended zones prevent the vegetation from expanding the water zone.

177-9 I do not agree with the plan to aggressively suppress all wildfires (page 2.31). Fire is an important and natural tool for nature. Suppression of all fires is poor management. This kind of policy is what got us in trouble at Yellowstone. I believe that wildfires should be permited to burn unless they threaten structures or are life threatening.

177-10 An allowable cut of 3700 cords of wood per year (page 2.31) is contrary to the assumption that a maximum of only 3000 cords of greenwood should be cut (page 4.15). Opening up 85% of the woodlands for cutting only leaves 15% of the land as natural woodland. This is inadequate since part of this 15% will be poor woodland.

177-11 You need to further restrict cedar post and christmas tree cutting to be the "lesser of demand or substainable yield". You sold 560 tree permits for an area where good quality trees are rare (page 3.72). Why sell something you do not have?

177-3 Please refer to our responses 70-1 and 79-2.

177-4 The need for protection zones around important archeological and paleontological sites was discussed during preparation of the plan, but it was determined they would not be needed because the laws that protect these resources give adequate protection without establishing additional protection zones. We agree that more surveys and enforcement activity is needed to protect these resources.

177-5 Please refer to our response 77-5.

177-6 Thank you for your support.

177-7 The purpose of OHV restrictions is to protect resources that would otherwise be damaged if the situation went uncontrolled. We feel that objective will be accomplished in the proposed plan. Approximately 42 percent of the resource area would be open, 6 percent closed, and 52 percent would be limited either yearlong or seasonally to designated roads and trails.

177-8 The 330-foot riparian zone begins at the outer edge of the riparian vegetation. BLM believes this provides adequate protection to riparian areas. Please refer to Appendix 6 for the BLM Utah's riparian policy.

177-9 We do not propose to aggressively suppress all wildfires. Refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for common guidance for prescribed fires. Naturally or human-induced fires would be allowed to burn when approved prescriptions are established and burn plan prescriptions are met.

177-10 The maximum firewood cut that can be maintained on a sustained yield basis in the proposed plan, is 3,700 cords per year. This figure was derived after eliminating all productive acres that could not be harvested due to restrictions imposed on woodlands by other resources or topographic features. It was assumed, based on demand, that the annual cut would level off near 3,000 cords per year. The additional 700 cords would be available for harvest each year if demand increased due to some unexpected event. Assuming 3,000 cords are cut each year, 65 percent of the productive woodland area would never be cut.

177-11 We realize good quality christmas trees and cedar posts are hard to find in the resource area. The only permits we sell are for personal use. There are many families that use this recreational opportunity for an early winter outing and

177-12 You only have 78000 acres of commercial value timber capable of a substable yield. The other 105000 acres are not productive enough to manage for a substainable yield (page 3.70). Harvesting this other acreage could prevent its return to a woodland site. On page 1.14 you state "All alternatives contain measures for protection of important woodland resources." This statement is false as indicated in the above paragraphs.

177-13 Why does alternative E specify treating 19,400 federal acres, when assumptions on page 4.15 says "Total vegetation treatment opportunities could be realized on approximately 18,000 acres . . . over the life of this plan"? Is this a balanced plan, or are you looking out for the livestock industry at the expense of other concerned users?

I have writen several other comments in my book which would be time consuming and lengthly to put into letter format. Therefore, I have attached copies of the relavant pages. If you can not read may sloppy writing, I can come in and read it to you. My phone number is 789-7162.

Sincerely,

Brent Hansen

Brent Hansen, CPA

attachments

have been doing it for years. The opportunity to cut a family christmas trees is very important to many people, even though the quality of the tree they cut may be only fair.

177-12 We have approximately 78,000 acres of pinyon-juniper woodlands productive enough to be managed on a sustained yield basis for firewood production. There are many other pinyon-juniper areas in the resource area that could be cut for firewood, but do not grow fast enough or reproduce well enough to be considered productive stands. Many times the best use of these areas is for wildlife habitat or livestock forage and they may, in some areas, be harvested with these goals in mind.

177-13 The 22,950 acres shown in Table 2-15 and A8-4 is a total figure, which includes vegetation treatment for wildlife and watershed management principally in the sagebrush and pinyon-juniper woodland communities.

NOTE: Mr. Hansen included hand-marked pages from the draft document. For the sake of brevity only, these additional pages are not included in this document. They may be reviewed at the Vernal District Office.

Lamont W. Moon
P.O. Box 257
Duchesne, Utah
84021
Phone: 738-5742

U.S. Dept. of The Interior
Bureau of Land Management
Diamond Mountain Resource Area
Resource Management Plan and
Environmental Impact Statement

Dear Sirs.

178-1 The first paragraph on page 1.5 reads as follows: "This issue involves the conflicting demands for consumptive and nonconsumptive uses of the vegetation, soil, and watershed resources within the Diamond Mountain Resource Area. The basic challenge is protecting resources such as rangeland values, air, water quality, soils productivity, vegetation cover, riparian areas and wildlife habitat while allowing, to the extent possible, uses affecting these resources. Conflicting uses could include: livestock grazing, woodland product harvest, off-highway vehicle use, recreation development, oil and gas development, and mining activities. The following questions will be answered in the plan."

I think this paragraph is a good example of the bias, and could be irresponsible thinking that we are seeing so prevalent in our country today. Part way through the 1st paragraph the word, conflicting, is used in referring to livestock, woodharvest, oil & gas, and mining. The real conflict is: how are the schools, hospitals etc. going to improve as they ought to while such a concerted effort is being taken to destroy the tax base. We are allowing things that are thrilling and exciting, to take precedents over things that are important.

Page 1.9 The Fish and Wildlife Habitat Management write up has the same problem as mentioned above.

178-2 Page 2.6 Animal Damage Control - The A.D.C. should have authority to control preditors. The B.L.M. should stick with range management, which should include the control of overstocking of big game, as is done with domestic stock.

178-3 Page 2.7 Livestock Management - Mention of the Taylor Grazing Act of 1934 FRIA of 1978 as inadequate, is based on the fact that more wildlife and pleasure in America is what

## RESPONSE TO COMMENT LETTER 178 (MOON)

178-1 Economic impacts are analyzed for each alternative in Chapter 4. Impacts from implementing the proposed plan should not significantly reduce the local tax base.

178-2 BLM responsibilities in animal damage control (ADC) are outlined in Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives.

178-3 Under management common to the proposed plan and all alternatives for livestock in Chapter 2, it was not stated that the Taylor Grazing Act and PRIA were inadequate. It does say however, that the existing planning documents did not clearly analyze the forage needs for objective wildlife levels.

178-3 Cont. is needed. Japan and much of the world is laughing at us. The people who wrote the Taylor Grazing Act etc. were people that had been affected by wars and hard times. They recognized what was important in relation to pleasure. How far are we going to continue in the direction that is drawing ridicule from Japan. Lets use our man-power and money in producing things that will compete on the world market.

178-4 Table 2:13 Alternative C is the best.
See the following under:

178-5 Page 2.35 Habitat Improvement - Increase wildlife only as improvements are made, is good.
Page 2.35 Habitat Protection - Most suggestions under this would be too expensive to manage in contrast to damage alone. We need limited control.
Page 2.40 Wildlife Transplants - Elk and Antelope are even now becoming too many. The B.L.M. needs to do more control, not use Fish and Game Courts. We don't need Big Horn Sheep if it will harm the livestock industry, destroy tax base or customs & culture.
Page 2.45 Livestock - I feel the B.L.M. should maintain present livestock numbers.
178-6 Page 2.47 Guzzlers and Springs are preferred to too many ponds. Most all reservoirs beome boggy as they silt in and thus become a great danger to livestock.
Page 2.51 Recreation Development - Maintain existing facilities.

Vegetation
178-7 Page 2.57 Control noxious weeds!
178-8 Page 2.59 If forage assignment can not be met, wildlife should be reduced.
178-9 Page 3.4 Antelope should stay at present level - not keep increasing. Elk numbers in many areas are too great.
Page 4.60 Dollar figures are not correctly portrayed. Can dollar values for recreation and dollar values for livestock industry really be compared. One will feed the
178-10 world in good as well as hard times, while the other will only happen in good times. Pleasures happen in a time of ease. In hard times people do without luxuries and pleasures. Are the comparison of dollars for wildlife and domestic stock like trying to mix oil and water?
178-11 Page A2.3 Big Horn Sheep will cause a serious problem to the livestock industry. What becomes of customs and culture!

178-12 Table A2.1 See Castle Peak: The current number of Antelope and Elk stated in the chart are no where close to the present numbers. The objective of 255 Elk and 217 Antelope is too big. I highly appose such numbers.

178-4 Thank you for your comment.

178-5 Please refer to our response 68-1 which discussed livestock-wildlife forage needs. Our analysis shows range improvement work could also supply additional forage for livestock and wildlife on the Castle Peak allotment. We believe the reintroduction of native bighorn sheep would not significantly affect the livestock industry as outlined in the proposed plan. Changes from domestic sheep to cattle would be accomplished through voluntary negotiations. Please refer to Table 2-15 under livestock.

178-6 Guzzlers are generally more expensive to construct than reservoirs and spring locations are limited. In many cases reservoirs are the only feasible water source option.

178-7 Thank you for your support.

178-8 Please refer to Table 2-15 under vegetation for forage assignments.

178-9 Please refer to our response 68-1.

178-10 Please refer to our response 109-4.

178-11 Please refer to our response 178-5 above. Any AUM losses to livestock due to negotiation to eliminate domestic sheep from proposed bighorn sheep reintroduction areas under the proposed plan would be accomplished over time and done voluntarily by grazing operators through change in class of livestock and alternative grazing systems. We hope this would alleviate any serious problems to the livestock industry.

178-12 Appendix 2 displays current wildlife use in AUMs, not individual animal numbers. If we assume the big game use in the Castle Peak allotment for 6 months, the AUMs would convert to 75 deer, 66 antelope, and 17 elk current use; and, 125 deer, 348 antelope, and 80 elk objective use. These estimates are for public land only and do not account for big game use on adjoining state and/or private lands. Based on herd unit population figures supplied by UDWR, we attempted to "pro-rate" these estimates on an individual allotment basis. We realize such an exercise could account for the difference in numbers we estimate for Castle Peak allotment and the numbers you have observed. Achieving objective levels would be based on continued range improvement work and vegetation monitoring to assure adequate forage is available to all.

#15 Starting last season the Castle Peak Allotment started to be used by both sheep and cattle.

Table A8.4 See Castle Peak - Alternative (A&C C&D)

178-13 I suggest a firewood harvest of 300 acres, which is good; however, 100 ponds are suggested which would be a great detrement to the country. It would create too many pog holes. All ready this is the best permit on the B.L.M. South Myton unit for well distributed water.

Approximately 18 good ponds now exist:

1) 2 at Crow Knolls
2) 1 at Snider Spring
3) 2 further down Snider Spring Wash
4) 3 at billies Knolls
5) 3 in Castle Peak Wash northeast side of permit
6) 2 at View Knolls
7) 3 at Castle Peak
8) 1 northeast of gilsonite mines
9) 1 between Snider Spring and Crow Knolls

Livestock producers are discontented. Oil companies in the Uintah Basin are selling where possible and moving, in some cases, over seas. The list goes on. How much further can we allow environmentalists to create rules and regulations which are pushing industry in the back ground?

Sincerely,

Lamont W. Moon

Lamont W. Moon

178-13 The correction of adding 18 existing reservoirs to Table A8-4 on page A8.3 has been made. Also the 100 reservoirs have been changed to read 50 on Table A8-4. These reservoirs would be built primarily for watershed improvement, but would have other benefits such as providing wildlife and livestock water and providing potential sites for riparian establishment.

Daggett Soil Conservation District

MANILA, UTAH 84046

March 30, 1992

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

Dear Ms. Smalley:

The Daggett County Soil Conservation District Board is responding to the request for review of the "Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement."

179-1 As a District Board we feel that the document is biased towards Tourism and Wildlife. We are supporting the letter that has been prepared by the Permittees. We feel these permittees support the concept of multiple land use.

We are attaching to this letter the comments presented by the permittees. Please address each of the items as you prepare the final document for the Diamond Mountain Resource Area.

Thank you for your consideration.

Sincerely,

Ivan E. Ruble

Ivan Gene Ruble
Chairman

RESPONSE TO COMMENT LETTER 179 (DAGGETT SOIL CONSERVATION DISTRICT, Ruble)

179-1 Thank you for your comments.

**GENERAL COMMENTS:**

**Economics of the Livestock Industry in Uintah County:**

Several times in the document agriculture is referred to as a minor or insignificant industry. According to the 1991 Utah Agricultural Statistics agriculture produced the following cash receipts:

| | Dagget County | Duchesne County | Uintah County |
|---|---|---|---|
| 1989 Cash Receipts | | | |
| Livestock & Livestock Products | $1,500,000 | 25,700,000 | 19,900,000 |
| Crops | $200,000 | 4,200,000 | 3,400,000 |
| Total | $1,700,000 | 29,000,000 | 23,300,000 |

Total for 3 Counties = 54,000,000

179-2 Fifty-four Million seems like a significant amount of money to us, the Diamond Mountain Resource Area has a direct impact on agriculture in these counties. As you can see most of the money derived from agriculture in the basin is due to livestock. Most of which at some time or other spend time on public land.

Several times in the document the value of an AUM is assumed to be $9.19. This value we believe, refers to the value of the forage to the permittee, including all cost associated with raising livestock except the capital cost of the livestock itself. This is not the value an AUM returns to the economy. In a paper publish in the Utah State Economics Department Dr. Nielsen has research the value for AUM to local Utah communities generated by cattle and sheep. The values per AUM of federal grazing for range animals in Utah's economy are:

| | |
|---|---|
| Gross value cattle (cow-calf operation) | = $23.72/AUM |
| Net value cattle (cow-calf operation) | = 13.66/AUM |
| Net value cattle x 3.5 multiplier | = $31.43/AUM |
| Net value sheep x 3.5 multiplier | = 47.81/AUM |
| Gross value sheep & cattle (slaughter weights) | = $35.86/AUM |
| Gross value sheep & cattle (retail-cut value) | = 54.07/AUM |

The 3.5 multiplier is from a state economic sector study by Dr. Syder USU Economist. He estimated the appropriate multiplier to measure secondary impacts to be 3.5 and should be used on net values.

179-2 Please refer to our responses 3-24, 104-2 and 104-3.

To figure a weighted average we took the net value for cattle and sheep and times that by the number of allotments which are: 88 cattle allotments and 16 sheep allotments. We took an average of the 31.43 value for cattle and the 47.81 value for sheep for an average value (39.62) for the dual-use allotments and obtained the following values:

179-2 Cont.

| | |
|---|---|
| 88 x $31.43 = | 2,765.84 |
| 16 x $47.81 = | 764.96 |
| 4 x $39.62 = | 158.48 |
| | 3,689.28 |

88 + 16 + 4 = 108

3689.28/108 = 34.16

The $34.16 would represent an average AUM value on the Diamond Mountain Resource Area which is significantly higher than the $9.19 value use to calculate gains or losses to the industry in the document.

We also believe it should be realized that several economists are questioning the value of hunting and tourism to local economies. They make the point that after you take in the amount spent on building and maintaining roads, providing additional law enforcement, picking up litter etc. in some cases tourism and hunting might have a negative economic value or a value that is significantly below the $25.00 value that is used in the document.

Also even though tourism might help the local economy, it must be realized that it does not generate any new wealth. If the money is spent here that means it is not spent in some other community. In contrast, the livestock industry generates new wealth every year with that year's production of livestock.

Furthermore, reductions in livestock AUMs result in direct loss to the local economy, a 9000 AUM reduction means that quantity of animals and the associated dollars are lost to the local economy. While an increase in the number of Wildlife AUMs might draw more tourist or might not draw more tourist and hunters depending on a number of factors and conditions.

Of deep concern to the livestock operators is the fact that every citation in the document concerning livestock returns refers to gain or loss to the livestock permittee or livestock industry. Never is it mentioned as a gain or loss to the local economy. In contrast, in almost every case gains or loss to the tourism industry is expressed as a gain or loss to the local economy. It is not expressed as a gain or loss to the local tourism industry. As livestock operators we feel we are an integral part of the local economy as we live here spend our money here and have done so for generations.

**Wildlife/Livestock Conflicts:**

179-3 Several times in the document conflicts are mentioned between wildlife and livestock. In almost every incidence the recommendation is to reduce livestock AUMs. While this might be the only solution in some causes we believe in most incidence's wildlife and livestock can coexist on the range. Terry Messmer Utah State Wildlife Extension Specialist recently reviewed the available literature on the subject he found 150 studies that looked at the effects of wildlife and livestock grazing. In 150 studies that mention livestock and wildlife 88% reported beneficial effects to wildlife from livestock grazing. We believe with proper management livestock and wildlife can graze together with beneficial effects to both. We also believe that this is also the best management practice to keep the range healthy and productive. Furthermore, since the area is supposed to be managed as a multiple use area we believe this best fits that usage. Included with this letter is citations of 52 studies reporting beneficial impacts from livestock to wildlife.

**Bighorn Sheep Introduction:**

179-4 The management plan calls for introduction of Rocky Mountain Bighorn Sheep. It also calls for a 10-mile buffer zone around reintroduction sites from domestic sheep. However the 10-mile buffer zone was not documented to any literature. We did find the Desert Bighorn Council did in one of there transcripts recommend a 9-mile buffer, however this was not based on research it was just a recommendation. It seems that the size of the buffer zone should be based on topography and be highly dependent on the natural barriers that separate the species. In Nevada Bighorns have been successfully reintroduced with a 2-mile barrier. Although, the several times bighorn reintroduction is mention in the document only one time does the document describe all the factors that govern successful reintroduction, these include: Adequate quantities of available range (2) lack of competition with other ungulates (3) Improper juxtaposition of key habitat components (5) adequate quantities of one or more critical seasonal ranges (6) lack of human harassment (Smith et al. 1991). We believe because of the serious impact these releases would have on livestock permittee's in these areas, very serious study and consideration should be given to these releases. We also feel much more research is needed on the subject, as these releases are extremely expensive and can force local sheep operators out of business. If bighorns are to be reintroduced it should be with the smallest buffer zone needed so as not to waste resources and lower the impact to local sheep producers. Therefore, we would like to see justification for the 10-mile buffer zone in the Diamond Mountain Resource area and how that was arrived at. Recently University of Idaho Veterinary Scientist have done several studies to study disease transmission from domestic livestock to Big Horn Sheep. In consulting with Dr. Alton Ward Head Diagnostic Bacteriology, several questions have

179-3 Please refer to our response 52-2.

179-4 Please refer to our responses 116-8, 178-5 and 179-22.

179-4 Cont.

sheep populations. In sampling 250 live-captured, and 7 dead bighorn sheep from Central and Southwestern Idaho and 19 Dall Sheep captured near Arctic Village Alaska. Lungworms were present in all groups even though none of the animals had contact with domestic animals. Also lungworms were found in two lambs that were taken by caesarean section and separated from the ewe suggesting the worms can be passed to offspring in the maternal environment. Furthermore, DNA fingerprinting of lungworms obtained from domestic and wild sheep showed they were a different species. Dr. Foryet found that in vaccinating wild sheep with domestic sheep Lungworm vaccine that the wild sheep still died. It appears that earlier literature suggesting lungworm transmission from domestic sheep to wild sheep was invalid because samples were taken from the nasal passages only, while recent research has shown that most wild sheep harbor the organism in greatest numbers in the tonsils. In talking with Dr. Ward he felt there were a combination of factors that caused Bighorn mortality including: Viruses, bacteria, stress, and population that are so small inbreeding results and causes a reduction in the immune system. Also, while Dr. Ward thought the populations should be separated, he could see no justification for a 10-mile barrier. Included is some recent research on the subject.

**Section: Summary**

| | Page: | Comment: |
|---|---|---|
| 179-5 | i | The management priority area concept is not defined as to how or what criteria are used to designate the levels also what personnel is envolved in making this decisions. Also these management priority areas should be guided by the multiple use concept and not give one use priority above another use. |
| 179-6 | iv? | Comment by Aldo Leopold according to the World Book Encyclopedia he wrote several essays defining the need to have wilderness areas. We hope this does not set the tone for the entire document as devoted to one area of interest and not to a multiple use, multi-group area. |

**Section: Chapter 1 Purpose and Need**

| | Page: | Comment: |
|---|---|---|
| 179-7 | 1.5 | Under the title Resource Uses Affecting Vegetation, Soils and Watershed Values, this whole section is aimed primary at developing wildlife habitat. It fails to address range improvements that will benefit wildlife and livestock. Also the paragraph on areas suitable for livestock grazing, grazing is not restricted to livestock, wildlife also graze, no mention is made of controlling over grazing by wildlife. |
| 179-8 | 1.9 | Under the title Fish and Wildlife Habitat Management at the top of column two the statement land closures for livestock grazing or surface disturbance are identified in terms of wildlife objectives. This seems to imply that wildlife are the dominant consideration, and that land closures for livestock grazing or surface disturbance is the only way to reach these objectives. This does not consider the most important factor, habitat, which may actually be improved by livestock grazing and it assumes that the grazing of livestock and wildlife have to be detrimental to each other. |
| 179-9 | 1.14 | Under the title Vegetation Management the statement Conflicts between wildlife and |

1

179-5 Please refer to our response 61-1.

179-6 Thank you for your comment.

179-7 We believe the first paragraph in the section you reference adequately explains the issue of resolving conflicting demands for consumptive and nonconsumptive uses of vegetation, soils, and watershed resources. The subsequent questions related to these broad issues are meant to help identify and analyze all uses affecting these primary resources and management actions necessary to maintain or improve these resources for the long term. The term 'management practices" ,as used in these questions, include range improvement and vegetative treatment, both of which may be beneficial to both livestock and wildlife.

179-8 The statement: "Land closures for livestock grazing or surface disturbance are identified in terms of wildlife objectives", has been deleted.

179-9 The statement: "At least one alternative gives wildlife first priority on critical winter ranges", has been deleted.

179-9 Cont. livestock forage uses are identified in terms of range carrying capacity. At least one alterative gives wildlife first priority on critical winter ranges. This statement fails to recognize vegetation management is the main objective and any management objective should be thought of in terms of the best possible management strategy for that goal and not in terms of giving wildlife or any other use first priority.

**Section: Chapter 2 Alternatives**

| | Page: | Comment: |
|---|---|---|
| 179-10 | 2.7 | The statement Livestock grazing management will incorporate the needs of key plant species important to wildlife and safe to use by wildlife . . . we hope this is also takes into account the fact that livestock grazing can benefit plant species needed by wildlife and can have a positive effect on vegetation management. |

**Section: Chapter 3 Affected Environment**

| | Page: | Comment: |
|---|---|---|
| 179-11 | 3.11 | Under the heading Mule Deer in the statement about deer wintering in the Brown's Park area no mention is made of the resource damage that is occurring do to high deer populations (Urness PC). MAS/TAN'S THESIS |
| 179-12 | 3.50 | The statement "Riparian communities along the Green River have been affected by historical human and livestock overuse and regulation of river flows from the Flaming George Dam." This statement does not include the damage from wildlife in that area. |
| 179-13 | 3.50 | Under Socioeconomic heading the statement "since the twentieth century, however a slow progression toward a land-extractive economy has been occurring" it must be realized that agriculture has not diminished in the area also agriculture is probably the most stable industry in the area. |
| 179-14 | 3.52 | Under the heading Recreation the statement "the |

179-10 Livestock grazing benefits to plant species needed by wildlife has been taken into account. Deer winter range in Browns Park, for example, is maintained by allowing spring cattle use on grass in the area to promote the vigor of existing sagebrush species.

179-11 The following sentences have been added to Chapter 3, under mule deer to clarify the heavy deer use. Six years of drought conditions (1986-92) have reduced sagebrush forage production and plant vigor on much of the deer winter range. Heavy deer winter use has intensified this problem and has been documented on the annual interagency deer pellet group transects. In response, UDWR has issued over 2,850 doe permits to offset these poor forage conditions.

179-12 We were unable to document historical wildlife overuse in the riparian communities along the Green River and thus the reason for wildlife being deleted from this sentence.

179-13 Thank you for your comment.

179-14 The economic section in the document has been substantially modified. The $25 figure you refer to has been removed.

179-14 Cont.

net economic value per day for recreation visitor day is $25." We would assume the means on average and he is not saying $25 is without exception the value. Also there is no mention of how this value was derived this needs to be explained and documented with facts or data.

3.53

179-15

Table 3-23 this table has some impressive figures on it however, it has no documentation as to how the net economic value was derived therefore no way to tell if it is accurate or not. Also is this net economic value to the Uintah basin or to Utah, Wyoming and Colorado.

3.53

179-16

The first paragraph that addresses hunting and recreation the reference to the citation by Bangerter 1989. This citation has no place in a scientific document a political speech by a political figure with no training in economics is very dubious to its validity. These figures may or may not be accurate, however where they were obtained is unknown so they cannot be validated. If these figures are to be cited they should be referenced to the person who calculated them and how they were calculated, not to who used them in a speech.

3.53

179-17

We could not find this [illegible]

Under the heading Agriculture, the statement agriculture plays a minor role in the basin economy is hard to define what is considered a minor role, and even if it is minor it is an important role to those affected by it. Also the statement Presently an AUM is valued at 9.19 as determined by the Agriculture Statistics Service USDA (1991). This might be a true statement but should not be used in the context that an AUM is only worth 9.19 to the local economy. The figure 9.19 is the value <u>on average</u> that AUM is worth to the permittee. The value of a Cow Calf AUM in Utah is estimated at 34.16 (Nelson 1991). This is the figure that should be used for economic comparisons, especially when comparing effects with hunting and recreation dollars.

**Section: Chapter 4 Environmental Consequences**

| Page: | Comment: |
|---|---|
| 179-18 4.4 | Under the heading Livestock the statement "the more recent demand for leaner red meat may |

179-15 Table 3-23 of the draft has been deleted. We believe the information as provided in this document adequately presents and analyzes the social and economic conditions and impacts of the proposed plan and the alternatives.

179-16 The correct reference for Governor Bangerter's speech is the 1985 "National Survey of Fishing, Hunting, and Wildlife Association Recreation -Utah", prepared by the U.S. Fish and Wildlife Service. The reference section of the document has been revised.

179-17 Please refer to our response 104-2.

179-18 The assumption section of Chapter 4 provides a basis for analysis based on available literature and trend. A demand for leaner red meat is not necessarily contrary to the statement that the livestock industry appears to have reached maturity in the West, it may mean a shift from feedlot finished cattle to rangeland cattle.

179-18 Cont.

affect the use of feedlots, increasing demand for rangeland forage by yearling cattle operations" seems to be in disagreement with the statement at the bottom of the paragraph. "Both the sheep and cattle industries appear to have reached maturity in the west. There is little indication of prospects for significant expansion." Also the reference to Field 1991 is not cited in the Reference Section so it is impossible to check the reference. Furthermore, statements like this should be used sparingly and conservatively, no one knows the future.

179-19

4.13

Under the paragraph The Rancher/Farmer desires to maintain traditional lifestyles does injustice to the farmers and ranchers these people are also deeply concerned about the environment, the condition of the resource area and the continued effort to improve the value, condition and ascetic value of the resource. They are also strong supporter of the multiple use concept and usually have a greater vested interest in the area than the young newcomer because the condition of the area can impact their heritage, livelihood and social values.

179-20

4.14

Table 4-3 Job Projections by Alternative, projections for Alternative E show a rather high impact to agriculture especially since several times in the document it is referred to as a minor or insignificant industry. It is not known how these figures are derived since under alternative E the number of livestock AUMs is supposed to stay the same.

179-21

4.16

Under the heading Impacts to Fish and Wildlife Habitat Resources the statement "Additional forage and increased numbers of watchable and hunting wildlife could generate an additional 63,400 per year to the local economy in expenditures for lodging, food, transportation, and equipment (Bangerter, 1991) This is seen as a beneficial impact." We think it must be realized that just because wildlife is there it is not certain that additional tourist will come view them, the tourism market may have already reached a maximum. Also the dollar figure has no documentation and once again the reference to Bangerter is unacceptable.

179-19 This section of Chapter 3 has been deleted as it does not add or detract from the intent of the analysis.

179-20 Table 4-3 of the draft has been deleted from this document. The model used to derive the data used in the table has limited applicability and was determined to be unsuitable for this project.

179-21 The word "could" was used to express the point of whether tourists would come to view additional wildlife. Our analysis is based mostly on increased hunting opportunities and the development of interpretive trails to enhance wildlife viewing.

4.17

179-22 Under the heading From Management Actions for Livestock Programs the statement "Negotiating with livestock permittees to eliminate domestic sheep use within a 10-mile buffer of identified bighorn sheep reintroduction areas has the potential to reduce the likelihood of disease transmission for domestic livestock to bighorn sheep. This would significantly increase survival rates for bighorn sheep." There is no reference to where the 10-mile buffer zone came from, after reviewing the available literature we could find no such reference, the Desert Bighorn Council Technical Staff 1990 in Guidelines for management of domestic sheep in the vicinity of desert bighorn habitat (Desert Bighorn Council 13 pp.) recommend a nine mile buffer. Some Bighorns in Nevada have been released with success with a two mile buffer. Besides the proximity to domestic sheep many other factors influence bighorn survival rates: Some recent research from the University of Idaho suggest Bighorns already carry the diseases that some are claiming they obtain from domestic sheep. The stress due to capture, transport, and release, and subsequent stress due to human activity, and forage competition with other wildlife can result in these diseases becoming lethal. Simply setting a ten-mile buffer will not guarantee success. Therefore the last statement in the paragraph "this would significantly increase survival rates for bighorn sheep" absolutely cannot be documented and should be stricken from the document.

4.17

179-23 Under the heading Impacts to Livestock Management Programs "improved grazing systems would result in an increase of 500 AUMs annually thereby positively affecting permittee's incomes" not only would this improve permittee's income it would also help the local economy, and the resource, ~~and~~ improve wildlife habitat and species diversity.

4.23

179-24 The last paragraph on the page "Assuming that 9.19 is the value of the forage consumed per AUM, 50,299 AUMs brings in 462,200 to the local economy annually." This is inconsistent with the statement of what the 9.19 value mentioned on page 3.53. This statement is what the value of forage is to the permittee and not the value the AUM has to the local economy which is

179-22 Please refer to our responses 110-10, 116-8 and 179-39.

179-23 Please refer to our response 3-24.

179-24 Please refer to our response 104-2.

179-24 Cont.

significantly more at $34.16 (Nelson 1991).

4.24

179-25

The first paragraph "Assuming $25 is the visitor use day value, then 190,000 recreation days will equate to 4,750,000 into the local economy annually." There is no documentation as to where the number of visitor days came from. Also we would challenge the statement to the local economy. This must include the Salt Lake metropolitan Area and parts of Colorado and Wyoming, Which shouldn't be considered the local economy.

4.26

179-26

Paragraphs 1,2,3 all make direct reference to the removal of livestock to benefit wildlife. This does not include management of livestock and wildlife to the benefit of each other and the resource area. It only allows that livestock and wildlife are not compatible which is in direct disagreement with literature on the subject.

4.26

179-27

Under the title Impacts to Livestock Management Programs first paragraph. Again no thought is given to management systems incorporating wildlife and livestock which have been shown in the literature to be beneficial to both.

4.26

179-28

Under the title From Management actions for Vegetation Resources. The figures are not validated and the reference to Bangerter is unacceptable.

4.27

179-29

The whole first column is implying the that livestock and wildlife are incompatible. This is very narrow minded thinking and is definitely not supported by any research or evidence. Also the figures of the cost to livestock industry are inaccurate and don't address the loss to the local economy.

4.30

179-30

Under title IMPACTS TO RIPARIAN HABITAT RESOURCES subtitled; From Management Actions for Livestock Programs. We agree completely with the statement "However not using livestock grazing to control noxious weeds on 18 percent of the early and mid ecological stage riparian areas, would result in weed expansions in riparian areas. These weed expansions could move ecological condition toward an earlier biogical stage." We also agree completely with the statement in the next paragraph. "Allowing

179-25 The visitor day number came from a report compiled annually by BLM. Estimates are made using visitor registers, car counters, UDWR hunting reports and estimates made by field personnel. Please refer to our responses 179-14 and 179-15.

179-26 The statement: "Where livestock management can be used as a tool to benefit wildlife, compatible grazing systems would be implemented" has been added to Chapter 4 under impacts from management actions for livestock management.

179-27 Grazing prescriptions are proposed as a tool to maintain or improve resources under the proposed plan and Alternatives A, C, and D.

179-28 Please refer to our response 179-16 above.

179-29 Under Alternative B, removing livestock to increase wildlife AUMs is one way to achieve the stated goals. It is not BLM's preferred method, however. Please refer to 104-2.

179-30 The same statement is not used under the other alternatives, because livestock could be used as a tool to control noxious weeds in riparian areas and to maintain or improve riparian values and wildlife habitat.

179-30 Cont.

wildlife forage to increase for wildlife use up to 67 percent from present forage use levels could causes unacceptable use on riparian areas, especially during drought years when wildlife would concantrate in wet areas. Livestock use could be controlled during these periods while wildlife are not easily controlled. Benefits to the riparian resource from reduced livestock grazing could be offsetby increased wildlife use." These statements we believe state very real concerns to simply reducing livestock AUMs as a panacea for everything. We wonder why they are not mentioned in other areas of the document.

179-31 4.31

Under the title From Management Actions for Vegetation Resources. We agree with the statement "Even with 100 percent allocation to watershed, this alternative would benefit watershed the least due to the low number of acres identified for vegetation treatment and the least amount of pinyon-juniper woodlands and sagebrush in mid ecological condition." This is a very good point.

179-32 4.33

The figures are inaccurate due to wrong assumptions about the value of an AUM to the local economy.

179-33 4.34

Column two again compares figures of loss to the livestock industry and gains made by recreation. These comparisons as stated are invalid. Also any loss to the livestock operators is also a loss to the local economy.

179-34 4.36

Column one, paragraph 3 we also agree with the statement "Vegetation management decisions in Alternative B allow only Biological control of noxious weeds and insects within the ACECs. This may cumulatively affect adjacent lands, via degradation and loss of desired vegetation composition and production levels, causing economic losses to state and private landowners".

179-35 4.37

Column two, top of the page. The statement "This would be a significant long-term negative impact to the majority of wildlife species within the resource area." How many and what species is the term majority referring to, and how are they negatively affected. According to

179-31 Thank you.

179-32 Again, please refer to our response 104-2.

179-33 Refer to 104-2.

179-34 Thank you.

179-35 Please refer to changes made in Chapter 4, impacts to fish and wildlife habitat from livestock for Alternative C.

179-35 Cont. the literature most species can benefit from livestock grazing.

179-36 4.38 Under the title Impacts to Livestock Management programs the statement about extra income to livestock permittees does not take in to account the positive economic impacts to the local economy.

179-37 4.39 Under heading From Management Actions for Livestock programs the statement "Cattle would congregate along the riverbank and adversely affect the visual quality of the corridor." This statement assumes first that cattle would congregate there and second that cattle somehow affect visual quality. This is a subjective viewpoint that would depend entirely on the viewer.

179-38 4.43 Column two Paragraph 2 and 3 appears to be mathematical error. Figures inaccurate due to previously stated reasons.

179-39 4.45 Column 2 last paragraph Statement "this would reduce or eliminate the successful return of Rocky Mountain Bighorn Sheep to their native habitat within the resource area". This statement is misleading and is not documented by scientific fact or evidence.

179-40 4.46 Under the title From Management Actions for Riparian Habitat Resources the statement "However, unfenced riparian areas could allow uncontrolled human and livestock use, resulting in continued deterioration of certain riparian areas in the resource area." This should also include a statement about uncontrolled wildlife use.

179-41 4.46 Under title From Management Actions for Vegetation Resources. Does not take into the account the value of the increase forage to the local economy or to wildlife.

179-42 4.50 Column 2 paragraph 4 the statement "Forage allocated to wildlife would remain at the current use of 27,600 AUMs." What about the addition 3,400 AUMs mentioned on 4.46 for bighorns and pronghorns.

179-43 4.52 Column one paragraph 4 and 5 wrong figures for previously stated reasons.

179-36 Please refer to our response 104-2.

179-37 We agree that the statement would depend entirely on the viewer. In this situation we are talking about a person that is floating on the river in a raft or fishing, picnicking or hiking along the river bank. We stand by our statement that cattle congregating along the river bank would affect visual quality in the area.

179-38 Please refer to our response 104-2.

179-39 This statement refers to the increased risk of disease transmission from livestock to bighorn sheep when livestock use is allowed in bighorn sheep habitat. This has been documented in the following scientific studies: Desert Bighorn Council Technical Staff, 1990; Spraker, T.R., 1977; Jessup, D.A., 1982, 1985; Foreyt, W.J., 1982, 1989; Onderka, D.A., 1988; Callan, R.J., 1990; Bunch, T.D., 1989; Sandova;, A.V., 1988; and Goodson, N.J., 1982.

179-40 Whether standard fences that control livestock are or are not used for riparian protection would not affect wildlife from using these areas. Concentrated wildlife use can have a detrimental effect on riparian areas, especially during drought. Please refer to impacts to riparian habitat resources from livestock program in Alternative B in Chapter 4.

179-41 Please refer to our response 104-2.

179-42 The paragraph on page 4.46 has been deleted.

179-43 Please refer to our response 104-2.

179-44 4.54 From Management Actions for Livestock Programs Again the claim for a ten-mile buffer with no documentation. In the second paragraph under this heading "Management actions would, overall benefit fish and wildlife habitat." Should also consider specific actions to manage wildlife to protect riparian areas.

179-45 4.54 From Management Actions for Vegetation Resources "Alternative E allows wildlife forage demand to increase from current levels of 27,600 AUMs to 40,000 AUMs a 31% increase" it should be mentioned that the vegetative treatments and other suggestions to provide additional forage should be implemented first before the wildlife is allowed to increase otherwise resource damage will result. Also the citation to Bangerter is not acceptable and the figures cannot be documented.

4.55 Under the title From Management Actions for Vegetation Resources. This section assumes addition forage for wildlife will come from range improvements and reduction in livestock AUMs. Livestock AUMs have already been reduced significantly and wildlife also winter much of the time on private ground it should not be the sole responsibility of the livestock owner to raise wildlife for the state. Any increases in wildlife should come after additional forage is provided and no more reductions in livestock numbers should have to be forced on the permittees. As in many cases livestock numbers are reduced then wildlife is allowed to increase above carrying capacity, resulting in resource damage which is blamed on livestock.

179-46 4.58 Under the title IMPACTS TO RIPARIAN HABITAT RESOURCES we agree with the management strategy presented in the statement " This improvement would be accomplished by implementing prescribed grazing practices conducive to riparian improvement, along with rangeland improvements and noxious weed eradication".

179-47 4.60 In column two, third paragraph there appears to be a mathematical error as a reduction of 9000 AUMs using the figure of 9.19 would equal a loss of 82,710 not the 11,500 dollar figure

9

179-44 Please refer to our responses 116-8 and 226-38. We would consider specific actions to manage wildlife to protect riparian areas if this became a problem.

179-45 Rangeland practices and grazing prescriptions would occur to provide additional forage in the proposed plan. Also preliminary monitoring indicates that the total forage available is close to meeting wildlife objective use and existing livestock preference levels. As stated in the document, reductions in livestock would be made on crucial wildlife habitat only after all management options are exhausted and only where there is a conflict between livestock and wildlife in meeting forage assignments shown by monitoring. It was assumed, as stated in Chapter 4, that achieving ecological condition goals through rangeland improvement and other management practices would provide enough forage for existing livestock grazing preference. The reference to Governor Bangerter has been corrected to USF&WS, 1985. Refer to the references section of this document for the full citation.

179-46 Thank you.

179-47 Refer to our response 3-24.

179-47 Cont. stated and the figure of 94,800 increase from tourism is not documented.

179-48 4.62 In paragraph 4 again the figures do not accurately reflect the impact to the local economy the reduction of livestock AUMs would cause. And over state the impacts of the possible increase in tourism would have to the local economy.

179-49 4.63 Paragraph 4 talks about the closure or heavy use restrictions imposed on livestock grazing within level 1 areas will result in a long-term ecological benefit to improved riparian ecosystem in these areas and water quality of the Green River drainage. What research or data is this based on, this is an open-ended statement with no substance. Riparian areas ought to managed as an area and not a small ecosystem excluded from the rest of the area. How is livestock grazing by itself affecting the water quality of the Green River? Is this implying the whole stretch of the Green River is being degraded by Livestock? Statements like this should be use conservatively and documented by data or research.

179-50 A8.18 This table is very general we realize it was done to save space in the document. However, it is extremely hard to understand the problems on the allotments when they are described in such general terms. The best solution would be a short statement individually describing each allotment its specific problems and possible management practices to solve the problem.

179-51 R.2 We could not find the citation by Godfrey E. Bruce anywhere in the document.

179-48 Refer to our response 3-24.

179-49 The sentence referred to has been omitted.

179-50 As you stated, the method used was intended to save space and the types of problems were intended to be general. Detailed objectives and problems by allotment will be stated and addressed at the activity plan level. Allotment management plans will be written, as funding provides, in a priority as listed on Table A8-5.

179-51 Bruce Godfrey was consulted during the writing of the economic analysis of the draft document, but none of his text information was used initially. In the final document Mr. Godfrey is cited as a reference.

NOTE: The comments from the Diamond Mountain permittees (comment letter #226) are responded to here. Approximately 200 original signatures were attached. For the sake of brevity only, these signature pages and accompanying reference section are not reproduced in this document. The entire letter, with signatures, is available for public review in the Vernal District Office.

RESPONSE TO COMMENT LETTER 180 (UTAH TRAIL MACHINE ASSOCIATION, Huck)

**UTAH TRAIL MACHINE ASSOCIATION**

CONSERVATION • COURTESY • SAFETY

March 24, 1992

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

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

Dear Ms. Smalley:

The Utah Trail Machine Association represents the interests of all motorized recreational users of public lands in Utah. Over the past several years we have become increasingly concerned with the apparent trend among federal land managers to restrict motorized access to public lands even though there is no objective data indicating that such access has resulted in any disproportionate impact to the resource.

This trend is especially troubling considering that motorized users are singled out from all other classes of users for special restrictions. This is inappropriate because any type of use will have some kind of impact on the land. Foot travel, mountain biking, and horseback riding all leave their own unique imprint on the land. Yet when the BLM , as well as other federal agencies, formulate plans restricting access, only motorized users and their effects are addressed.

We are well aware that certain well financed and highly organized groups have made it a priority to attack motorized recreation on public land by developing and perpetuating a body of propaganda that greatly exaggerates the negative impacts of motorized recreation, while completely neglecting the impacts of their own chosen uses. It is your responsibility as professional land managers to make decisions that are not only based on factual information, but also are responsive to the needs of all classes of your constituents.

Also keep in mind that in the next few years approximately two millions acres of the most scenic land in our state will be withdrawn from multiple use and placed into the the most restrictive category of all: Wilderness. Because all motorized users will be totally excluded from these vast areas you should have an added incentive to maintain such access to the greatest possible portion of the remaining lands.

Motorized recreation is an important part of the economy of our state. The 1990 Utah OHV Survey found that motorized recreation adds 180 million dollars to our economy annually. The figures given in Table 3-23 show that motorized travel in the DMRA encompassed 54,200 hrs while non-motorized travel amounted to only 14,000 hrs. It is clear that reducing motorized travel opportunities will negatively impact a huge segment of your users.

180-1 We would suggest that if it becomes necessary to impose travel restrictions in any particular area, these such restrictions should apply to ALL forms of travel. If soils, wildlife, or plants in a region will be harmed by a passing motorcycle, then they will also be harmed by horses, mountain bikes, and troupes of hikers. A few quick calculations will reveal that the specific pressures exerted on the ground by horses' hooves, bicycle tires, and even hikers boots can greatly exceed those exerted by motorcycle or ATV tires. Furthermore, motorized users tend to make day trips, returning to a camp or to home to spend the night. Non-motorized users, on the other hand, due to their slower rate of travel tend to stay overnight, thereby increasing certain types of pollution. This is especially true of horse travel. All public land users should be included in any travel restrictions that you propose for the Resource Area.

We find the motorized travel restrictions suggested for the Red Mountain area unjustified and arbitrary. For many years this has been a popular destination for motorized users and there has been no objective data presented showing excessive impact from this use. The argument that certain resources COULD be impacted by motorized access is without merit and inconsistent with our system of laws and does not belong in any public document. If damage is occurring due to human activities in this area then it should be closed to ALL human access.

The protection of relict vegetation is cited as a reason to restrict motorized travel in the Red Mountain area. Page G.11 cites the following definition for relict vegetation:

> A vegetation community or area within a vegetation community relatively undisturbed by **human activities** to allow the community to progress towards it natural climax composition. (bold face added)

This definition in and of itself would compel the land manager to restrict all human travel in the area to be protected. To limit the closure to motorized travel is not only discriminatory but also defeats the purpose of the restriction.

180-1 It is not our policy to limit all users to an area unless there are impacts being created by all users. We prefer to address impacts and consider needed restrictions on an individual basis. Some give and take is normally required by all to accommodate the needs of others. Please refer to our response 13-1.

CONCLUSION:

180-2 We argue strongly AGAINST the adoption of Alternative B (Ecological Systems) It is a kind of watered-down wilderness management approach that totally ignores the needs of the vast majority of your constituents. You have a responsibility to serve the needs of the people who use these lands. There will be enough formal wilderness designated to achieve the whatever purpose is served by removing human activity from the public lands.

The Red Mountain area should remain open to motorized access as has been the case for many years.

We urge you to adopt one or a combination of the remaining alternatives together with increased sensitivity to the legitimate needs of those who desire or require motorized access to lands under your stewardship.

Thank you,

Rainer Huck, Ph.D.
President, UTMA

180-2 Thank you for your comment.

P.O. Box 592
Vernal, Utah 84078
March 30, 1992

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

Dear Ms. Sinclair,

181-1 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 support the Uintah Mountain Club's proposals for the improvement of Alternative E.

181-2 I oppose any more land designed for phosphate mining in the Red Mountain - Ashley area. I would rather see more
181-3 Level 1 and Level 2 management prescriptions. Protective zones around sensitive archaeological and paleontogical sites should be included.

I hope the BLM will be sensitive to the land and the people rather than the needs of special interests.

Sincerely,

Roy Krubsack

Roy Krubsack

## RESPONSE TO COMMENT LETTER 181 (KRUBSACK)

181-1 Thank you for your comments. Regarding phosphate mining, please refer to our response 61-2.

181-2 Please refer to our response 61-1.

181-3 Please refer to our response 177-4.

March 31, 1992

Good Morning.

I haven't comprehensively plowed through the whole Diamond Mountain Resource Management Plan, but here's an opinion anyway.

Of the five alternatives, Alternative E is clearly the best. The others are far too biased toward various single purposes. Even this good start can be improved, I think.

189-1 -- Please consider removing the area around the Taylor Mountain Road between Red Mountain and Dry Fork from eligibility for mineral development. That seems to be extraordinary ground for a number of reasons and deserves to be given some protection.

189-2 -- Maybe you could identify more land as Level 1 and Level 2. That would at least give more time to inventory the resource and be able to make more informed decisions on pockets of sensitive terrain. It's easier to preserve it than repair it.

189-3 -- Feel free to regulate access by ORV's. Nothing says that machines have the same access rights as people, especially in delicate areas.

189-4 -- Is there some way to give more emphasis to paleontological and historical values? How can already identified sites be protected?

Again, Alternative E seems to be the best bet. I congratulate you on your work; it's lots of information about some pretty great country. Please keep me informed on further developments in the planning process. Thank you very much for your time.

Sincerely,

Day DeLaHunt

Day DeLaHunt
PO Box 69
Jensen, UT 84035

RESPONSE TO COMMENT LETTER 189 (DELAHUNT)

189-1 Thank you for your comment. Please refer to our response 61-2.

189-2 Please refer to our response 61-1.

189-3 The proposed plan does outline the OHV designations for the resource area. Please refer to the interim OHV map enclosed in Map Packet #10 for the graphic depiction of the designations.

189-4 The map in Chapter 3 identifying highly sensitive paleontological areas has been expanded to include additional areas. The criteria used in the draft for allowing collection of this resource has been strengthened to give more protection to the resource. More frequent visits to important paleontological and histoic areas by BLM personnel would provide a greater degree of protection for these resources.

Dinosaur Land

DINOSAUR NATURAL HISTORY MUSEUM AND DINOSAUR GARDENS
VISITORS' CENTER, DINOSAUR NATIONAL MONUMENT
ASHLEY NATIONAL FOREST
FLAMING GORGE RECREATION AREA

**VERNAL AREA CHAMBER OF COMMERCE**

134 WEST MAIN VERNAL, UTAH 84078 (801) 789-1352

March 27, 1992

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

Dear Team Leader Smalley:

190-1 From what we have been able to learn in general about the Diamond Mountain Resource Area Resource Management Plan And Environmental Impact Statement Draft, we prefer alternatives A or E over alternatives B,C and D. We are not prepared at this time to make comments on specific aspects of the draft but we have encouraged our members and committees to participate as they feel appropriate on their own behalf.

We appreciate very much the efforts made by the bureau, its director and staff to keep us informed of the progress of this very important project.

Sincerely yours,

Mark Foley
President
sn

RESPONSE TO COMMENT LETTER 190 (VERNAL AREA CHAMBER OF COMMERCE, FOLEY)

190-1 Thank you for your comment.

March 30, 1992

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

Dear Ms. Smalley,

191-1 I appreciate the opportunity to comment on the BLM's proposed Diamond Mountain Resource Management Plan. I support Alternative E, only if it is extensively amended. Before I detail the suggested amendments, I must express my general dismay at the apparent one-sidedness of the alternative. I feel it fails badly to provide a full spectrum of varying degrees of development on the land. In particular, a pitifully small area is slated for very protective management, whether it be for watershed protection, recreation, or wildlife. I would like to see much more land designated level 1 and 2. I also support the Uintah Mountain Club's proposal, which seems to me a true compromise.

191-2 The slickrock area north of Steinaker Reservoir should be closed to motorized vehicles, except for the existing road to the top of Red Mountain. This slickrock, with arches, and alcoves, is a very unusual area for northern Utah. It is the closest natural area recreation to Vernal, and I go there about 10 times per year. I also take student groups there, in the Earth Sciences Field Studies classes. Limiting access would protect the area, but it is, and still would be, accessible to anyone capable of walking up easy paths for short (less than 1 mile) distances.

I feel the only legitimate conflict here is between motorized versus non-motorized recreation. The mineral resources (e.g., phosphatic rock) appear far too deeply buried for economic recovery. The rock itself is not liable to much habitat or range improvement. Inasmuch as nearly all of the resource area will be open to motorized vehicles, includin part of this area, then I feel non-motorized recreation should be the highest use at Level 1.

191-3 Protection zones restricting surface activities around archaeological and paleontological sites should be established, along with enforcement of same to protect our public resources. These sites are numerous throughout the slickrock area, both behind Steinaker and Redfleet.

RESPONSE TO COMMENT LETTER 191 (ELDER)

191-1 Please refer to our response 61-1.

191-2 Please refer to our response 79-2.

191-3 Please refer to our response 177-4.

191-4 If the land in Diamond Breaks and West Cold Springs WSA's are not designated as wilderness, then this land should be placed into the Browns Park ACEC. Both the Upper and Lower Green River would benefit from Wild and Scenic designation.

191-5 The riparian area and canyon of Dry Fork around Alma Taylor Hollow should be a Level 1 recreation area, with non-motorized recreation the highest use. In this area is an extensive riparian forest, the large springs of Dry Fork, as well an informal trail system up Alma Taylor Hollow.

191-6 The Endangered Species Act should be followed when dealing with;

- the riparian zones of the Middle and Lower Green River (for the 4 endemic fish, and roosting of wintering bald eagles)
- The slickrock canyons and pinnacles behind Steinaker and Redfleet (peregrine falcon eyries)
- The riparian areas of Ashley Canyon, Dry Fork Canyon, and the riparian areas of the slickrock canyons (Spiranthes and silverspot)

Sincerely,

Tom Elder

191-4 Please refer to our response 77-5. Both the upper and lower Green River segments are recommended for wild and scenic river designation in the proposed plan.

191-5 Dry Fork Canyon around Alma Taylor Hollow has been identified as a developed recreation site. OHV use is limited to designated roads and trails. It has been identified as a no surface occupany area for leasable minerals. It also has been closed to grazing by livestock. It is our opinion that designating the area as level 1 would be unnecessarily restrictive to recreation development of the area.

191-6 Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for a discussion of the Bureau's responsibilities under the Endangered Species Act.

March 31, 1992

BUREAU OF LAND MANAGEMENT
Vernal District Office
170 South 500 East
Vernal, UT 84078

REGARDING THE DRAFT DIAMOND MOUNTAIN RMP WHICH WAS RECENTLY SENT TO ME, I WOULD LIKE TO GIVE YOU MY RECOMMENDATION IN THE RED MOUNTAIN AREA.

THIS AREA HAS BEEN USED IN A MULTI-USE CLASSIFICATION FOR YEARS. THIS AREA IS MOSTLY SANDSTONE, WHICH IS NOT SUBJECT TO DESTRUCTION FROM VEHICLES, HORSES OR HIKERS.

THERE HAS BEEN CATTLE, WILDLIFE AND MANY OTHER TYPES OF ACTIVITY IN THIS AREA. THE STATE OF UTAH CREATED SOME OFF ROAD TRAILS FOR ORV USE AND THESE ARE USED EXTENSIVELY, NOT ONLY BY LOCAL PEOPLE, BUT MANY FROM OTHER AREAS ARE USING THIS PUBLIC LAND FOR RECREATIONAL PURPOSES.

AS FAR AS I CAN DETERMINE, THERE HAVE NOT BEEN CONFLICTS BETWEEN DIFFERENT GROUPS OF PEOPLE, SUCH AS HORSES VERSUS ORV USERS. ALL TYPES OF PEOPLE SEEM TO ENJOY THE AREA AND COOPERATE WHILE USING THIS AREA.

192-1 THE SMALL AMOUNT OF EROSION DAMAGE SEEMS TO BE NEGLIGIBLE OR EASILY REPAIRED . I WISH TO RECOMMEND TO THE BLM THAT THEY LEAVE THE PRESENT CLASSIFICATION OF THE RED MOUNTAIN AREA AS IS, WHICH I BELIEVE WILL SERVE THE CITIZENS BEST.

SINCERELY,

Norman C Pease

NORMAN C. PEASE
2293 West 1000 North
Vernal, UT 84078

RESPONSE TO COMMENT LETTER 192 (PEASE)

192-1 Thank you for your comment. Please refer to our response 10-1.

March 31, 1992

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

Attention: Penelope Smalley

We became aware of this Diamond Mountain Resource Plan a few weeks ago. We have looked at it and tried to understand it, but, frankly, it is so complicated it is unfair to expect an informed opinion of much of it.

193-1 One thing we did notice is the introduction of bighorn sheep could limit grazing. This is not right. We don't market and eat bighorn sheep.

193-2 Also we don't understand the black-footed ferret issue but it seems it will have an impact on use of livestock that would be restrictive.

We do not directly run livestock, but our family does and we share acreage on Diamond Mountain. So we are interested in changes that would affect this area. We have an interest in the Little Hole and do not think the range condition is unsatisfactory, as listed in this plan. It is our experience that a farmer or rancher who provides a living from the very land he uses, tries to manage the resources to the best advantage.

193-3 We are concerned about the cost involved in producing this management plan and huge volume. Also, it is interesting that little to no input is included from those who actually work on and care for the land and resources and from private land owners included in the study.

193-4 We are concerned about the restrictions that could be placed on private ground and limits to livestock permits. Before any of these alternatives are considered those directly involved should have more input.

Sincerely,

Pam Whitmire
Clif Whitmire

Clif and Pam Whitmire
2611 South Vernal Avenue
Vernal, Utah 84078

## RESPONSE TO COMMENT LETTER 193 (WHITMIRE)

193-1 We believe the reintroduction of native species could be accomplished without significantly affecting the livestock industry. Reintroductions would also be consistent with other federal and state land management agencies' goals of restoring bighorn sheep to their historic range. Please refer to our responses 116-8 and 178-11 for further information.

193-2 Refer to pages A2.10 and A2.11 for the proposed black-footed ferret reintroduction guidelines. Under the proposed plan there are no significant impacts to livestock grazing resulting from these guidelines.

193-3 Thank you for expressing your concern. Public input from all the public land users has been sought and received throughout the RMP process. Specifically, input has been sought and received during the initial scoping period, to identify issues of concern to the public land users; in the development of the planning criteria, the guidelines in the development of the alternatives, and, in the development of the alternatives themselves. It is our opinion that the draft RMP and the proposed plan/final EIS adequately reflects the input from the public land users received during the public scoping period at the beginning of this project.

193-4 No restrictions outlined under the proposed plan or any alternative would be applied to private land. Livestock permittees will continue to be directly involved in management of their allotment.

March 30, 1992

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

Dear Ms. Smalley,

I am a concerned citizen interested in the best possible long term management of our federal lands, and would like to support Alternative E for the BLM's proposed Diamond Resource Management plan. This alternative seems more balanced than the others. In addition, I would like to see some modifications to it to make it better.

194-1 There are several issues only partially addressed in Alternative E. First, I would like to see more lands in level 1 and 2. In particular, the Uintah Mountain Club's proposal seems to me a reasonable compromise, which would allow more protection than Alternative E alone would provide. Also, the slickrock area north of Steinaker Reservoir should be closed to motorized vechicles as this is a very unusual area for northern Utah. The area adjoining Moonshine Arch consists of spectacular slickrock which has been abused because of motorized access. I hiked there in
194-2 November, and there were several areas where slickrock had been spray painted with lots of beer cans and trash on the ground. Limiting access would provide some protection from this type of abuse. In addition, the BLM would do well to consider the acquisition of State Section 16 in the Red Mountain Area to help preserve this slickrock area. Some private lands should also be acquired.

194-3 Protection zones restricting surface activities around archaeological and paleontological sites should be established, along with enforcement of same to protect our public resources.

194-4 I have no problem with ORV use in general, but it seems to make sense to me to concentrate ORV use in areas less sensitive to long term damage than the present proposals allow. It seems to make no sense to allow ORV use on all lands within the Diamond Mountain Resource Area.

194-5 If the land in Diamond Breaks and West Cold Springs WSA's are not designated as wilderness, then this land should be placed into the Browns Park ACEC.

RESPONSE TO COMMENT LETTER 194 (OLSON)

194-1 Please refer to our response 61-1.

194-2 Please refer to our response 70-1.

194-3 We are not planning to establish 200-foot extended protection zones around archeological or paleontological sites in the proposed plan, but the sites will be protected.

194-4 OHV use will be allowed on the less sensitive areas in the resource area without restrictions. However, on sensitive areas this use will be limited during critical time periods to protect important resource values. Examples of these are deer wintering areas and critical soils during wet periods. There are several areas in the resource area where OHVs are prohibited yearlong. Please refer to the OHV map provided in Map Packet #10.

194-5 Please refer to our response 77-5.

194-6 Both the Upper and Lower Green River would benefit from Wild and Scenic designation.

Sincerely,

David P. Olson

194-6 Thank you for your support.

State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS AND RECREATION

Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Jerry A. Miller
Division Director

1636 West North Temple, Suite 116
Salt Lake City, Utah 84116-3156
801-538-7220

March 30, 1992

David E. Little, District Manager
Bureau of Land Management
Vernal District Office
170 South 500 East
Vernal, Utah 84078

Dear Mr. Little:

As curator and park manager at the Utah Field House of Natural History State Park in Vernal, Utah, we are frequently involved in the evaluation of paleontological resources on BLM land in the area. This letter is in response to your request for a review of the draft Resource Management Plan/ Environmental Impact Statement for the Diamond Mountain Resource Area. Your Alternative E seems to be the most acceptable management plan. However there are a few points that we would like you to further consider.

195-1 PALEONTOLOGY: Map 2-7, Table 2-18 Alternative E, defines several ACECS. Known paleonotologically sensitive formations, with known fossil localities, are found in several of these areas (as defined by Map 3-3). More detail is needed under the Browns Park Complex (Miocene vertebrate fossils from the Browns Park Formation); Red Mountain-Dry Fork Complex (Mesozoic vertebrate fossils - see my expanded list); Pariette (Uinta Formation badlands - Eocene mammals).

195-2 Table 2-13: Surely there is a misprint under Cultural and Paleontological Management Alternative E. Protection zones should be established for paleontological and cultural resources, with vertebrate fossil collecting only allowed by permit. Casual collecting of invertebrates and plant fossils using hand tools could be allowed with BLM permission (check in with you prior to going into the field). Surface disturbance by OHV use should be kept to a minimum in these zones. Type localities for numerous mammal fossils and some other vertebrate material are known from the Diamond Mountain Resource Area. To not protect these areas would be considered very poor management by the scientific community at large.

195-3 Table 3-2 Highly (to moderately sensitive depending on the area) formations for paleontological resources. In the last few years paleontological researchers have discovered significant vertebrate fossils and traces in this area (see enclosed figure). If you need references regarding this data, please contact us. Therefore, please add these formations:

Carmel Formation - Middle Jurassic - Presence of heretofore unknown dinosaur footprints

RESPONSE TO COMMENT LETTER 195 (STATE OF UTAH, DIVISION OF PARKS AND RECREATION, Bilbey & Hamblin)

195-1 Thank you. This information has been added to Chapter 3.

195-2 This table has been corrected. Inventories for paleontological resources will be conducted on highly sensitive areas before surface disturbing activities are allowed to take place. If paleontological resources are found, impacts will be mitigated through avoidance or exacvation. At this time OHV use will be allowed to continue.

195-3 Thank you. Both the table and map have been modified to include the new data you provided.

195-3 Cont.

Curtis Formation - Late Jurassic - Presence of marine reptiles, both types the first found in Utah of this age. (Ichthyosaur and Pliosaur)

Mowry Formation - Early Cretaceous - Presence of the first known perch (Beryciforme fish)

Frontier Formation - Middle Cretaceous - Presence of heretofore unknown dinosaur footprints.

Wasatch Formation - Early Eocene - Reptile and mammal fossils, some of the earliest primates. Aided in the definition of mammal ages.

Browns Park Formation - Miocene - Mammal fossils (*Gomphothere*, camel, horse, etc.)

The definition of Tertiary mammal ages was determined by fossils collected from the Uinta, Duchesne River, Bridger, and Wasatch formations from the Uinta and Green River Basins.

195-4 Table 4-18: Summary of Impacts: Alternative E would be best, perhaps with additional recognition of sensitive areas which could be managed more rigorously, e.g. the anticlinal nose of Split Mountain where the Morrison Formation is well exposed and is known to contain vertebrate fossils. See the enclosed map that outlines paleontologically sensitive areas.

195-5 WATER: Although you consider the potential for contamination of the ground water from a number of sources, you do not discuss potential for destruction of the aquifer itself. Mining, particularly west of the on-going phosphate operation, places the ground watershed at risk. Much of the annual flow into the valley's aquifer comes from water flowing into caverns in the limestones of the Mississippian and Pennsylvanian formations. These caverns honeycomb under the Park City Formation. Blasting associated with mining collapses these caverns, destroying inlets for the groundwater. Water is our most precious commodity in this desert. Most of it is being carefully managed: let's protect these caverns and the aquifers as well.

I hope that this further information will assist you in preparing the final draft of the Diamond Mountain Resource Area Management Plan.

Sincerely,

Sue Ann Bilbey

Sue Ann Bilbey, Curator

Alden Hamblin

Alden Hamblin, Park Manager
Utah Field House of Natural
History State Park
235 East Main
Vernal, Utah 84078-2605
(801)789-3799

195-4 Please refer to our response 195-3 above.

195-5 Please refer to our response 61-2.

1060 4th Ave
Salt Lake City, Utah 84103-4122
March 27, 1992

Ron Trogstad
Diamond Mountain Resource Area Manager
170 South 500 East
Vernal, Utah 84078

Dear Mr. Trogstad:

196-1 I am writing in regard to the Diamond Mountain Resource Management plan currently under review. Please adopt a plan which will enhance ecological and cultural values which in turn will enhance low impact recreation opportunities.

The time I spend each year backpacking in the Uinta Mountains and rafting the Green River are tied to the Diamond Mountain Resource Area. The wildlife I see in the Uintas depend on the Diamond Mountain area for winter forage and the water quality of side streams entering the Green River depends on well managed land. Driving through herds of cattle on overgrazed land on the way to the Island Park put in last year marred the experience of a couple of friends from Vermont we were introducing to Utah rafting. Please increase the wildlife grazing allocation to balance the livestock allocations.

I want to thank you for opposing unfair hunting methods like bear baiting and I ask that the management plan be compatible with wildlife reintroductions including the blackfooted ferret. I want to ask for alternative livestock grazing levels that will allow better range management, so that vegetation treatment will not be necessary. Please limit any vegetation treatments to natural methods such as fire.

I would like to see off road vehicle use strictly limited under the new management plan. I do not think that sale or transfer of critical wildlife habitat should be allowed. I would like to see the Green river protected as a wildlife corridor and considered for more Wild and Scenic River protection. I hope mineral leasing can be strictly limited especially in productive wildlife lands and I hope low potential for mineral development will be equitably balanced against the high cost of environmental damage. This issue of mineral development is especially close to me because of damage I have witnessed in an area in which I once spent much time hiking.

Thank you for your consideration of my comments.

Sincerely,

Ron Raunikar

## RESPONSE TO COMMENT LETTER 196 (RAUNIKAR)

196-1 Thank you for expressing your concerns. We believe the proposed plan is the best balance of protective management while allowing compatible uses within the resource area.

March 31, 1992

Dear Mr. Trogstad,

It has come to my attention that the BLM has released for public comment a draft Environmental Impact Statement and Resource Management Plan which address the Diamond Mountain Resource Area in northeastern Utah. My purpose in writing to you: is to urge you to support the preservation and/or enhancement of the area's natural integrity, by deemphasizing the potential for continued resource exploitation and/or development. I feel this area hosts many important archaeological, wildlife, and recreational values—and most importantly, it contains habitat for several endangered species (i.e. Colorado River squawfish, humpback chub, razorback sucker, bald eagle, peregrine falcon, and whooping crane).

In my opinion, alternative B of the draft EIS, would be the best choice, and alternative E would rank second out of the five proposed, even though several improvements and clarifications are needed. Specifically, these improvements are:

197-1 1. Further reductions in the number of AUM's allocated to domestic livestock.

197-2 2. Implementation of better range management instead of employing vegetation manipulation for improving the range condition--and if treatments are absolutely necessary, do them with prescribed burning, a natural method.

197-3 3. Opposition to any black bear baiting as an acceptable hunting method.

197-4 4. Close the entire Diamond Mountain area to all mineral development—and if that is not possible, at least close all of the proposed Browns Park Complex and Nine Mile Canyon Areas of Critical Environmental Concern, the Ouray National Wildlife Refuge, and the Wild and Scenic River candidate rivers, to any type of mineral leasing, as even the no surface occupancy stipulations could later be waived. (I understand the Resource Management Plan lists the mineral potential on Diamond Mountain as low.)

197-5 5. Study the entire length of the Green River in the Resource Area for Wild and Scenic designation, as it serves as a critical habitat and travel corridor.

197-6 6. Close all riparian, proposed ACEC's, Wild and Scenic Rivers, and the two Wilderness Study Areas north of Browns Park to Off-Highway Vehicle use, except on existing and designated roads.

197-7 7. Consolidate land holdings on Diamond Mountain, instead of further confusing land ownership patterns by trades.

In short, I strongly support the ACEC recommendations, the Wild and Scenic River study for all of the Green River, and a "no lease mineral" recommendation on sensitive lands. Please lend a listening ear, and take the courage to stand up to the seemingly overwhelming pressure from commodity interests. Thank you for your attention.

Sincerely,

James W. Thompson
3901 South Viking Road
Salt Lake City, Utah
84 109

## RESPONSE TO COMMENT LETTER 197 (THOMPSON)

197-1 There have been significant livestock reductions in the past as stated under the "Forage Allocation History" in Appendix 8. This data has shown that we are very close to meeting both livestock preference and wildlife proposed increases under the proposed plan. Range improvement and management practices would provide the additional forage necessary to fulfill the requirements. Refer to Table 2-15, under vegetation, regarding forage assignment criteria.

197-2 Vegetation manipulation is an approved tool in range management. Refer to vegetation resources under Management Guidance Common to the Proposed Plan and the Alternatives in Chapter 2, and the 1991 bureauwide Vegetation Treatment EIS, available at each BLM office. Also refer to Appendix Table A8-4 for prescriptions of the major treatment methods planned.

197-3 Please refer to our response 114-34.

197-4 We believe it is unnecessary to close the entire Diamond Mountain, the proposed Browns Park and Nine Mile Canyon ACECs and recommended wild and scenic river segments to all mineral development. The proposed management levels and mineral categories for these areas are adequate to protect the important and crucial resource values while allowing for responsible resource development.

197-5 The entire length of the Green River in the resource area was evaluated for possible inclusion into the wild and scenic river system. Based on criteria set forth in the Wild and Scenic Rivers Act, it was our determination that the upper segment, through Browns Park to the Colorado state line, and the lower segment, between the public land boundary south of Ouray to the Carbon County line be recommended for designation as wild and scenic river segments. Because of conflicts and local opposition to designation of the segment between Dinosaur National Monument and the public land boundary north of Ouray, a determination was made to drop this segment from further consideration. Please refer to Appendix 7.

197-6 Please refer to our response 177-7. It is not our policy to close large areas to OHV use because they are called ACECs, Wild and Scenic Rivers, or wilderness study areas, etc. We prefer to identify particular problems within these areas and change or limit the type of use that are aggravating or causing the problem. Using this approach some areas can remain open to OHV use within these important areas.

197-7 Please refer to Chapter 2, Management Guidance Common to the Proposed Plan and the Alternatives, for land ownership dispositions.

295 Crossbow
Green River, Wy 82935
February 18,1992

Mr. David Little
District Manager
Bureau of Land Management
170 South 500 East
Vernal, Utah 84078

Dear Mr. Little:

198-1 I would like to make some comments about the Resource Management Plan. After communicating with Questar, I found out they paid Metcalf Archaeological $222,669. for the archaeological work they did on the recent pipeline across Browns Park. Mapco paid about the same amount for their pipeline and Cheveron has two pipelines across Browns Park. This adds up to nearly a million dollars paid for archaeological work required by BLM. Did the taxpayers get a million dollars worth of information out of these studies? Where are the artifacts and reports? In the same report from Questar it appears they spent $400,000. for the Jensen River Bore instead of about $40,000. for a wet crossing. This was to save the humped back chub. Is the Bureau of Reclamation still going to raise the amount of water released from Flaming Gorge to save the humped back chub this summer? Is this wasting water for irrigation and water for power? Questar spent $42,346 looking for the Black Footed Ferret along the pipeline. Questar paid $67,861 to Greystone Consultants for an environmental Assessment. Driving along any highway or dirt road in this area you will notice cows and wild game feeding in pipeline right aways and you see more game around the Cheveron Phosphate mine than anywhere else. It is obvious these companies are improving range conditions. Do we need environmental assessment statements or bonds to be sure reclamation is completed after construction? No matter how you look at it taxpayers eventually have to pay for these studies. No wonder we have such inflation in this country.

After the first pipeline went across Browns Park, was there any additional information gained in the following three pipelines, or did BLM just give the companies an excuse to raise the rates.

I think the BLM should publish each year what each company has to spend to satisfy government requirements that is not related to the actual construction of each project. BLM should publish each year what it costs in such projects as saving the Humped back chub, looking for Black Footed Ferrets, and saving the spotted owl.

If we are going to stay competitive with foreign markets, we are going to have to keep our cost down in the manufacturing of each product. Fuel is certainly a necessary requirement for any manufacturing product. I believe this information would help our legislators have the whole picture and the USA would not become a second rate country. Gas rates are high enough lets be sure studies are going to benifit taxpayers before requiring them.

Sincerely,

Allen Crane

## RESPONSE TO COMMENT LETTER 198 (CRANE)

198-1 Thank you for your comments.