

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Dinda Evans	I-1	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Dinda Evans	I-1	SD1	Areas proposed for wilderness in America's Redrock Wilderness Act should be closed to oil and gas leasing.	<p>The BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).) Further, FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations.</p> <p>In addition, the BLM's Land Use Planning Handbook (H-1601-1) directs BLM to "identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				impacts to wilderness characteristics.”	
Dinda Evans	I-1	SD2	Do not designate any roads inside proposed wilderness areas.	See above Response to Comment SD1-I-1.	
Joan & Mark Strobel	I-2	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses. Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat. See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Joan & Mark Strobel	I-2	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	
Joan & Mark Strobel	I-2	RE2	Off-road vehicle use destroys the visitor experience for any other user group both on the immediate route and within earshot of that route.	Comment noted.	
JP Lee	I-4	ME95 (ME-G)	Several proposed wilderness areas in the planning area are part of America's Redrock Wilderness Act, a measure now pending in Congress. The DEIS is wrong to open much of this area to oil and gas leasing. The Vernal RMP should provide complete protection	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			for the wilderness character of these areas by prohibiting oil and gas leasing and excluding Off Road Vehicles.		
JP Lee	I-4	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
JP Lee	I-4	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Willa H. Drummond	I-5	ME99 (ME-K)	The opening of [places such as the Red Rocks Wilderness] to noisy, polluting motorized intrusion and destructive development to feed an unsustainable and inherently dangerous national addiction to oil is unwise. Please do as the Native American ancestors would have done; think of your children and grandchildren seven generations in the future. What will be left for them?	See comment response ME61.	
Vince Biondo	I-6	GC1	I/We support/favor the Great Dinosaur/Book Cliffs Heritage Plan.	Comment noted.	
Crista Worthy	I-7	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Barbara Backman	I-8	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29	
J. Justin Crabtree	I-9	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Jane Broadwell	I-10	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				TR29.	
Jane Broadwell	I-10	WF109 (WF-G)	"Any lands or waters known to contain federally proposed or listed threatened or endangered species or their proposed or designated critical habitat; and...." DCWCD would like to request that the word "proposed" be omitted, as we do not see that a plan of operation should be required when the species is merely "proposed" as threatened or endangered.	43 CFR 2090 Mining Claims Under the General Mining Laws; Surface Management; Final (2000), [Federal Register: November 21, 2000 (Volume 65, Number 225)], which is a revision of the 40 CFR 3809 surface mining regulations, include proposed critical habitat as areas that would require a plan of operation.	
Kelly Skeen, Delee Skeen, Travis Skeen, Tiana Skeen, Tahnee Hamilton, Lorin Hamilton	I-11	GC44 (GC-C)	Please allow OHV use on our public lands as well as continued oil and gas development in the Vernal area. I think there is room for everyone.	Comment noted.	
Mr. & Mrs. James L. Denison	I-12	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Mr. & Mrs. James L. Denison	I-12	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Donald Lintner	I-13	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Donald	I-13	SD222	The expansion of the Lower Green River ACEC is not	See Response to Comment SD27-G-22.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Lintner		(SD-QQ)	justified. The importance criteria given in the draft RMP for the Lower Green River Expansion states that the relevant values "have substantial significance due to qualities that make them fragile, sensitive, rare, irreplaceable, exemplary and unique." However, the document fails to mention which or any of the qualities that make this area qualify for a special designation.		
Donald Lintner	I-13	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Blair McLaughlin	I-14	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Abe Levy	I-15	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Tim Maret	I-16	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Bran Potter	I-17	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
John Wise	I-20	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Walter Merschat	I-21	FM7 (FM-A)	The BLM needs to investigate the possibility of coal fires in the planning area.	Comment noted.	
Walter Merschat	I-21	ME110 (ME-V)	I am concerned that this DRMP and DEIS falls short with respect to numerous critical environmental impacts associated with CBM extraction	Comment noted.	
Walter Merschat	I-21	SW22 (SW-A)	The DRMP and DEIS needs to further study Coal Bed Methane water issues	Coal Bed Methane water issues will be studied and analyzed in NEPA documents prepared at the field development-level and project-level stages, when the exact location and nature of the proposed development is known and the impacts can be quantified.	
Walter Merschat	I-21	SW23 (SW-B)	If the BLM were to consider down-hole injection/reinjection as one possible way to treat or dispose of CBM produced water, a comprehensive study must be undertaken to protect existing aquifers from degradation due to cross contamination from a disposal well.	Down-hole injection or re-injection of waters produced as a result of Coal Bed Methane development or any other minerals and energy development is under general consideration as a means of disposing of wastewater; however, no specific management actions stipulating such a process are proposed in the RMP. The environmental effects of injection or re-injection of wastewater will be analyzed at the field development or project-specific level when the details of such proposed actions are known.	
Walter Merschat	I-21	SW24 (SW-C)	The BLM must take a critical review of how CBM dewatering operations can affect the natural springs in the planning area.	Analysis of the potential impacts of CBM dewatering on water resources will be analyzed at the field development or project-specific level when the details of such proposed actions are known.	
Walter Merschat	I-21	SW25 (SW-D)	In a similar situation as springs, wells (domestic, industrial, municipal or others) completed in or above the coal can feel the effect of CBM dewatering and either experience a lowering of a water head or go	See comment responses SW23 and SW24.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			completely dry. The potential for similar losses of water in this area is high with CBM operations and deserves further investigation by the BLM		
Walter Mersch	I-21	SW26 (SW-E)	The BLM must take a serious look at the effects of CBM on aquifer recharge.	See comment response SW23 and SW24.	
Ross Tocher	I-22	ME98 (ME-J)	Mineral leasing should be excluded from all areas proposed for wilderness designation in America's Red Rock Wilderness Act-25% of the planning area. It would be wiser to protect the 25% and allow leasing on the other 75% (instead of the 93% preferred plan) of the planning area as Utah citizen's groups have suggested.	Comment noted.	
Ross Tocher	I-22	SD189 (SD-J)	BLM has acknowledged 328,000 acres (17% of the planning area) have wilderness characteristics or are likely to meet that standard and they are shown as such in the draft. 2 years ago Secretary Norton dropped some of those lands from interim management protection but said BLM could use other authorities to protect them. I do not see that protection in the draft plan.	See Response to Comment SD1-I-1.	
John Spezia	I-23	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Bill Walsh & Shirley Weathers	I-24	AT17 (AT-I)	I ask you to consider a balanced alternative for recreation/travel and mineral leases.	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	AT33 (AT-Z)	Adopt alternative C Areas of Critical Environmental Concern (ACEC's) so that sensitive habitat is protected against new development and unnecessary travel.	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	CR23 (CR-A)	The BLM's 1994 Nine Mile Canyon SRCMP called for the Canyon to be nominated to the NRHP. It was signed by David Howell, Ron Trogstad, and David Moore for the VFO. It is now 2005 and the nomination has not been completed. We believe the VFO can facilitate progress. We recommend that the goal of submitting the NRHP nomination be written into the RMPs of Vernal and Price BLM.	The BLM is supporting the preparation of the National Register nomination of Nine Mile Canyon through the Nine Mile Canyon Coalition. It is anticipated that the nomination will be submitted to the Utah State Historic Preservation Office for consideration and submission to the Keeper of the Register prior to the issuance of the final RMP. As such, the inclusion of a specific management goal	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>for the nomination of Nine Mile Canyon would be obsolete by the time the PRMP/FEIS is adopted. The Draft RMP, on page 2-8, does include the Management Common to All goal to "...nominate eligible sites, districts, landscapes, and traditional cultural properties for inclusion in the National Register of Historic Places..."</p> <p>Note: The text from page 2.8 of the Draft RMP is now located in Table 2.1.4 (Cultural Resources) of the PRMP/FEIS under Management Common to All Alternatives.</p> <p>The VFO can only address the comment in the context of the RMP for the Vernal Planning Area and cannot require inclusion of the information requested in the RMP of another field office. We suggest you address a similar comment to the Price Field Office.</p>	
Bill Walsh & Shirley Weathers	I-24	ME111 (ME-W)	Despite its cultural uniqueness, Nine Mile Canyon has become a staging area for gas development. The machinery and trucks using the Canyon road are degrading other resources. Even with watering and magnesium chloride, the road has never been in worse shape in our memory. Has developers should be held to stricter standards than they have been heretofore. When they act irresponsibly, they should be made accountable.	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	ME95 (ME-G)	Several proposed wilderness areas in the planning area are part of America's Redrock Wilderness Act, a measure now pending in Congress. The DEIS is wrong to open much of this area to oil and gas leasing. The Vernal RMP should provide complete protection	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			for the wilderness character of these areas by prohibiting oil and gas leasing and excluding Off Road Vehicles.		
Bill Walsh & Shirley Weathers	I-24	RE36 (RE-P)	The SRMA plan for Nine Mile Canyon should at least follow Alt C. OHV traffic should be limited to present routes. It should not be expanded into lower Nine Mile Canyon and Jack Canyon where it could jeopardize cultural resources.	Comment noted.	
Bill Walsh & Shirley Weathers	I-24	VI46 (VI-C)	Nine Mile Canyon in its entirety deserves a VRM class I, but present VRM 2 areas should not be lowered any further.	Under Alternative A, Nine Mile Canyon would be managed as VRM Class II and III, with the majority of the canyon from rim to rim managed as Class II. A similar management strategy would be implemented under Alternative C. Under Alternatives B and D, the majority of the Canyon would still be managed as Class II, with small areas adjacent to the canyon managed as VRM Classes III and IV.	
James R. Allison	I-25	CR1	The DEIS demonstrates overconfidence about archaeologists understanding of the distributions of archaeological sites, and, more specifically, it inappropriately generalizes the results of outdated, poorly designed sample surveys to estimate the numbers of sites likely to be affected under the different alternatives.	The BLM believes that the best available data was used to provide general estimates of site numbers. These numbers are then used in a comparative basis to assess the relative effects of each of the alternatives. Section 4.3 in the PRMP/FEIS notes that the method is not precise, and emphasizes that it is used to assess relative effects. In terms of assessing impacts of each alternative, the relative effect is more important than exact numbers of sites, and the method utilized, while admitted by the Final EIS to be inexact, is supported by the best available data as the surveys utilized are the only ones currently in the public domain. The method used is also replicable and non-arbitrary.	
James R. Allison	I-25	CR10	BLM should require inventory of all areas proposed for oil and gas leasing. Sample surveys may be adequate for evaluating whether exceptional numbers of sites, or	The BLM's current practices require inventory of all areas proposed for oil and gas development prior to ground disturbance. These project-specific	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			sites of exceptional quality, make the area unsuitable for leasing, although complete inventory of the areas to be leased prior to the actual leasing would allow well pads and other facilities to be designed from the beginning to avoid cultural resources.	inventories typically follow upon programmatic level NEPA evaluations for field development, which consider the broader scope of the cultural landscape within the area proposed for development, but do not generally address individual cultural resource sites. Data as analyzed in these documents are predicated upon numerous inventories in any given area of the Vernal Field Office and the experience of professionals in the field.	
James R. Allison	I-25	CR11	The BLM should require, wherever feasible, practices that reduce the amount of ground disturbance from oil and gas development and reduce the amount of traffic accessing previously roadless areas along roads to oil and gas facilities.	Standard lease terms and special lease stipulations call for the inventory and either avoidance of or mitigation of impacts to National Register-eligible or identified sacred/traditional resources. BLM further encourages the location of multiple wells on single drilling pads and the consolidation of access roads in order to reduce surface disturbances. Additionally, permits issued by the BLM authorize surface disturbance and travel only in those areas where cultural resources assessment has taken place and appropriate avoidance, minimization, or mitigation measures have been implemented.	
James R. Allison	I-25	CR2	The DEIS greatly underestimates the numbers of sites that might be impacted under each of the alternatives. Section 4.3 of the DEIS includes a number of statements reflecting the uncertainty in the estimated numbers of sites that would be impacted by various management decisions, but always concludes that the numbers of impacted sites are relatively low.	It is important to note that the estimations regarding cultural resource sites are designed to provide estimations of sites involved in resource decisions. Because of other laws and considerations that occur during the development of specific actions, sites identified and involved in actions are not necessarily impacted by those actions. Thus, the Final EIS more precisely discusses sites "involved" in management decisions, but not necessarily impacted. While the exact numbers of sites involved in decisions may be different than the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>numbers estimated in the Final EIS, the replicable estimation exercise does provide a relatively accurate order of magnitude estimation, and this estimation indicates relatively low numbers of sites are likely to be involved in the management decisions, even if the estimates are doubled or tripled. The numbers of sites used in relative assessments of management decisions are produced in a manner that is consistent and replicable, despite the inherent uncertainties involved in such estimations.</p>	
James R. Allison	I-25	CR3	<p>The problems with site density demonstrations are numerous, but they begin with the fact that the sample surveys used as justification are outdated and were so poorly designed to begin with that they cannot even be used to estimate site densities within their study area boundaries.</p>	<p>The sample surveys used for the site density model are currently the only models, to our knowledge, that are in the public domain. They therefore constitute the best available data. They are used in a replicable and consistent manner throughout the analysis. They are drawn from a variety of areas throughout the region, and thus, while not an ideal sample, do at least capture some of the variation in environments in the area.</p> <p>Modeling is based on parameters for a given area and is only applicable to that area. The wide variety of physical settings, site locations and site types make for a complex mix of predictors.</p> <p>Additional data is received daily, and the resulting agency database of site information is updated continually. The predictive model used in the RMP was based on the available data at the time the model was developed. Locational data from the numerous inventories completed in a given year, professional experience, and new data inputted into the NEPA process as EAs, EISs and projects are</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>considered. These data are used to aid the manager in decision-making.</p> <p>Finally, professional archeologists with an extensive background in this area combine that knowledge with the data derived from the ongoing and dynamic database for northeast Utah. An extensive and detailed library of references are also used by the professionals who specialize in archaeology.</p>	
James R. Allison	I-25	CR4	<p>Many of the sites recorded during the sample surveys are not recorded to current standards, and many sites that would now be considered eligible for the National Register were not considered eligible when they were recorded. The sample surveys thus almost certainly underestimate the number of significant sites.</p>	<p>It is correct that some sites identified during the sample surveys used to construct the model were not documented to current standards nor evaluated according to current knowledge, the classification of sites as eligible or ineligible for the NRHP is irrelevant to the model used in the analysis for the RMP. The model employed to analyze relative proportionate impact by alternative calculates numbers of sites regardless of their NRHP-eligibility.</p> <p>As inventories are done, site forms are updated to bring those sites recorded in the past up to current standards. This data is then utilized in management of cultural resources.</p>	
James R. Allison	I-25	CR5	<p>The problems with using these sample surveys are compounded by two erroneous assumptions: first, that they are generalizable to the entire area covered by the DEIS; and second, that they "identified the average number of sites per square mile in zones of high and low cultural resource sites."</p>	<p>See comment response CR3.</p>	
James R. Allison	I-25	CR6	<p>The specific value for high density site zones (4.87 sites per sq mile) significantly underestimates the actual densities of sites in true zones of high density. It is not clear in the DEIS how this figured was derived.</p>	<p>The estimation of counts of sites per square mile in areas of low and high site density is based on an average of multiple surveys that included a low reading of 0.13 sites per square mile in low density</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>The DEIS states that it is a conservative average of the Red Wash and Seep Ridge surveys, which found site densities ranging from 0.13 and 6.5 (which would give an estimate of approximately 3.32 sites per sq mile), so the average must be weighted, but the DEIS does not specify or justify. If these numbers are to be used, the DEIS should provide a better justification for them.</p>	<p>zones the Red Wash II survey area and 6.5 sites per square mile in high density zones in the Seep Ridge survey area. Both averages are based on more than these two survey areas, they are given as the extremes in the DEIS to demonstrate the full range. Because the primary focus is on relative effects (e.g. the percentage increase or decrease in numbers of sites involved in management decisions) rather than absolute numbers, the density estimates are actually less important than they might otherwise appear. While it might be possible to change the site density estimates, changing these estimates would not substantially change the relative outcomes nor affect the overall analysis.</p> <p>As the database is updated, this data is used by investigators, many of which have extensive experience in the region. Thus, an up-to-date site pool and reference library is available to these investigators. Management can base decisions on up-to-date information.</p>	
James R. Allison	I-25	CR7	<p>The real problem is that, in general, the state of archaeological inventory in the Vernal BLM district is not adequate for proper management of archaeological resources.</p>	<p>Inventory of a statistically valid sample of the 1.7 million acres of BLM lands within the VPA for the purpose of preparing the RMP is not feasible. For this reason, the BLM has used the best available data at the time this document was prepared to identify general management measures related to cultural resources. The BLM has included stipulations for the identification of cultural resource sites and the avoidance, minimization, or mitigation of impacts to those resources for land use activities permitted under the RMP.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				Federal law concerning cultural preservation mandates that in all applicable situations, e.g. ground disturbing actions, their effects are processed under existing laws, regulations and standards. The inventory is updated weekly and this information is provided to the manager for decision making.	
James R. Allison	I-25	CR8	There are serious gaps in the cultural resource inventory data that make it impossible to properly integrate cultural resources into the planning process, and only way to remedy these data gaps is through additional inventory.	See comment response CR7. The data provided to managers are based on weekly inventories completed for projects and extensive EA and EIS documents. The documents are utilizing current data at all times. More inventory does not equate to proper management as the data is complete at the time of the decision by federal managers.	
James R. Allison	I-25	CR9	In general, concentrating OHV traffic onto designated routes, while restricting it elsewhere, will be beneficial to cultural resources, but it is important to first ensure that the routes being designated as open to OHV use do not contain cultural resources.	Routes being designated through the RMP are existing routes where disturbance has already occurred. No new routes are being proposed for construction. Impact assessments for the routes will be carried out as part of the implementation plan that will be prepared subsequent to the RMP.	
John R. Watson	I-26	SD188 (SD-I)	I urge that the following streams be designated as a National Wild and Scenic River as they contain outstanding natural qualities: Argyle Creek, Bitter Creek, Evacuation Creek, Lower, Middle & Upper Green, Upper, Nine Mile Creek, and White River.	See Responses to Comments SD14-G-3 and SD8-G-9.	
Ervin Young	I-27	WH36 (WHB)	Nothing is said regarding planning considerations for the Bonanza Wild Horse Unit. This should, and would appear to, end the matter of wild horses on the	See comment response WH35.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Bonanza Unit, yet in the Alternatives C and D there are continuing management proposals for that herd.		
Ervin Young	I-27	WH37 (WHC)	The boundaries of the Bonanza Wild Horse Herd unit on the south side of the White River extend all the way down to the border with private property along the river. There is currently no and we see no proposals for, any blockage of animal access between the BLM property and private property. Problems will be the same problems that were encountered in previous years when the BLM brought the horses back onto the range, even after their own EIS stated they would remove them.	<p>This would not be applicable under Alternatives A and B. There would be no Bonanza Wild Horse Herd under either of these alternatives.</p> <p>Blockage of animal access under Alternative C would be addressed at a future date in the Herd Area Management Plan.</p> <p>Finally, Alternative D proposes to construct 3 miles of gap fences where cliffs on the north rim of the White River would not provide natural barriers. Cattle guards would be placed on roads where needed to ensure the integrity of the fences.</p> <p>See comment response WH35.</p>	
Ervin Young	I-27	WH38 (WHD)	On the first BLM EIS issued during the past few years, the BLM justified the removal of the wild horses from the Bonanza Unit. The unit was deemed unsuitable to maintain a wild horse herd because there was not an adequate amount of the cool climate grass varieties needed to sustain a wild horse unit. The 2005 EIS now says that there is enough to sustain the horses-Which is it?	See comment response WH35.	
George & Frances Alderson	I-28	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
George & Frances Alderson	I-28	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
George & Frances Alderson	I-28	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
George & Frances Alderson	I-28	GC2	The RMP should include a transportation plan.	Information on Travel Designations can be found in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS. BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to further refine the travel management network through an implementation plan to be completed after the signing of the ROD for the Final EIS.	
Cindi K. Timmermann	I-29	AT17 (AT-I)	I ask you to consider a balanced alternative for recreation/travel and mineral leases.	Comment noted.	
Joel G	I-30	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Joel G	I-30	AT14 (AT-F)	<p>The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the</p>	<p>See comment response AT1.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.</p>		
<p>Krista Batterson</p>	<p>I-31</p>	<p>AT13 (AT-E)</p>	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Krista Batterson	I-31	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Dan Bellis	I-32	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Dan Bellis	I-32	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Thomas M. Power	I-33	GC141	The DEIS' Preferred Alternative (A) would focus almost exclusively on the extraction of oil and gas. It would make 94 percent of the total acreage available for oil and gas development. It would seek to realize 99.4 percent of the oil and gas potential available under the maximum development alternative (B) by opening 99 percent of the acreage that would be developed under that alternative. This allocation of land to one particular commercial use suggests that the Vernal FO sees few other landscape values that would justify restricting oil and gas development.	Comment noted.	
Thomas M. Power	I-33	SO108	The DEIS projects that oil and gas development under the preferred alternative would result in 215,000 new jobs being created. Given that the total employment in the planning area is about 23,000, this would represent almost a ten-fold increase in employment over the next 20 years. That would be an oil and gas boom of monumental proportions.	Based on the data available to the BLM, the socioeconomic section has been rewritten in the FEIS. See Section 4.12.3.1 for explanation of employment numbers. See also comment responses SO31 and SO54.	X
Thomas M. Power	I-33	SO109	Analysis of how mineral extraction employment has actually changed with oil and gas drilling in the Uinta Basin indicates that about one annual job is associated with a new well being drilled and about one operation and maintenance job is associated with every 6 wells brought into production. The DEIS, in contrast, estimates that there are 30 jobs associated with each well drilled and 24 jobs associated with every 6 wells brought into production. The job impact estimates	Based on the data available to the BLM, the socioeconomic section has been rewritten in the FEIS. See responses to comments SO31 and SO54.	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>based on the actual experience in the Uinta Basin used in the report (Power 2005: The Economic Impact of Expanded Oil and Gas Development in Utah's Uinta Basin) used to prepare my comments are confirmed by studies elsewhere in Utah and the Mountain West. There is no evidence to support the DEIS oil and gas job multipliers.</p>		
Thomas M. Power	I-33	SO110	<p>What is relevant to the evaluation of the various policy alternatives that the EIS process is supposed to analyze is not the total employment that might be associated with ongoing regional oil and gas development but the incremental changes in employment that result from choosing one management alternative rather than another. Those incremental impacts are much, much smaller because substantial oil and gas development is going to take place no matter which alternative the BLM chooses. Under the "No Action" Alternative (D), for instance, oil and gas development would realize 92 percent of the oil and gas potential that the Preferred Alternative (A) and the maximum development alternative (B) would realize. Thus, the maximum employment impact of a decision coming from the alternatives being considered in the Vernal RMP is actually only about 8 percent of the total impact.</p>	See comment responses SO31 and SO54.	
Thomas M. Power	I-33	SO111	<p>Total employment growth associated with the ongoing development of the oil and gas resources in the Uinta Basin will be modest, but significant. An additional 1,430 jobs are projected over the next 20 years. This represents a gain of 5.4 percent in the projected total employment in the two counties in 2025. That is, employment growth in the two counties, instead of growing by about 255 jobs per year, would grow at 330 jobs per year, a net gain of 75 jobs per year or three-tenths of one percent.</p>	See comment responses SO31 and SO54.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>The incremental impact of different policy alternatives would be much smaller. The alternative that imposes the most restrictions on oil and gas development (C) would reduce the number of wells drilled only slightly, 2.6 percent. Over 20 years, that would reduce oil and gas employment by only about 30 jobs. If the Vernal FO were to protect two times as much land as envisioned in Alternative C by adopting the citizens' alternative "Greater Dinosaur/Bookcliffs Heritage Plan", the reduction in oil and gas jobs over 20 years would be only 70 jobs out of a total projected workforce of 26,000. That would be less than a one-half of one percent reduction.</p>		
Thomas M. Power	I-33	SO112	<p>Although school districts in the Uinta Basin collect considerable property tax revenues from oil and gas developments, the Utah state school equalization program largely offsets those oil and gas tax revenues by reducing the payments the state government makes to those school districts. The intent of the Utah school equalization program is to assure that approximately the same resources are available to support the education of a student regardless of how rich or poor the school district's tax base is. Statistical analysis of that program confirms that it is largely successful in offsetting the "windfall" that certain school districts otherwise would receive from the oil and gas developments within their taxing jurisdictions. For that reason, expanded oil and gas development in the Uinta Basin will not dramatically improve the financial condition of local schools.</p>	<p>Contributions to local and state governments have been revised in the FEIS. As a result of the equalization program, BLM did not specifically analyze resource management impacts to local school districts.</p>	X
Thomas M. Power	I-33	SO113	<p>County and municipal governments do not benefit from "equalization" program similar to those used for school districts. For that reason, expanded oil and gas</p>	<p>See comment response SO112.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>development can effectively increase local government revenues. Those impacts, while significant, are quite modest because oil and gas property taxes represent a minority of total property taxes and property taxes represent a minority of local government revenue. For Uintah, Duchesne, and Daggett Counties combined, for instance, oil and gas property taxes represent about 17 percent of total property taxes and property taxes represent only 20 percent of total local government revenues. As a result, oil and gas property taxes make up only 3.5 percent of local government revenues. Because of this limited role of oil and gas tax revenues in local government budgets, the ongoing expansion of the oil and gas industry in the Uinta Basin will have only modest impacts on local government budgets. Ten years out, the projected expansion would be local government revenues about 5.5 percent.</p>		
Thomas M. Power	I-33	SO114	<p>The incremental impact of the various alternatives being considered by the DEIS on local government finance would be extremely small. The most restrictive alternative being considered would only reduce oil and gas development by 2.6 percent compared to the maximum development alternative. That would reduce the annual number of wells drilled by about 8. Instead of 316 wells being drilled each year, 308 would be drilled. Ten years into the future this would reduce county government revenues by \$47,000, about one-tenth of one percent of projected county government budgets at that time. A more balanced management alternative, such as that proposed in the "Greater Dinosaur/Bookcliffs Heritage Plan", that sought to provide more extensive protection for other resource values would have only slightly higher impacts on local government budgets, about two-tenths of one percent.</p>	<p>Regarding the "Greater Dinosaur/Bookcliffs Heritage Plan" the BLM has incorporated elements of this plan in its action alternatives, particularly Alternatives C and E. The BLM has also incorporated several elements of this alternative in its FEIS.</p>	
Thomas M.	I-33	SO115	<p>Mineral extraction rarely brings prosperity to rural</p>	<p>The commenter is correct in stating that average</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Power			<p>areas. The Uinta Basin is no exception. Despite its heavy commitment to the oil and gas industry, average pay and income lag the statewide averages significantly, employment, income, and population growth are unusually slow, and poverty and unemployment rates are above average. The Uinta Basin is not unique in finding that specialization in mineral extraction does not bring economic vitality and prosperity. Elsewhere in eastern Utah, across the nation, and around the world mineral dependent economies perform poorly compared to more diversified economies. The Uinta Basin's own history as well as that of other mineral dependent regions makes clear that continued reliance primarily on mineral extraction will not solve the problems of a lagging economy. "More of the same" is not an economic development strategy for the Basin. Diversification of the economy has to be a crucial aspect of any successful economic development strategy. The Uinta Basin economy is not solely dependent on mineral extraction for economic vitality. The regional economy survived the oil and gas bust in the early 1980s with the non-mineral sectors returning to a significant growth path. The seeds for an ongoing diversification of the Basin's economies are already present. They need to be supported.</p>	<p>pay and income in the Uintah Basin lag behind the State of Utah as a whole. This lag, however, may not be as significant as the commenter suggests. Data from the State of Utah 2008 Economic Report to the Governor indicate that per capita personal income averaged \$29,769 for the state, \$28,024 for Uintah County, and \$28,457 for Duchesne County. Both counties exceeded the state averages for employment and population growth percentages. Although both counties had lower per capita income than the state as a whole, both counties were ahead of most rural counties in Utah.</p> <p>Wages in the oil and gas industry greatly exceed wages in other sectors. The FEIS includes an expanded discussion of the economic impacts of the oil and gas industry in the Uintah Basin.</p> <p>The PRMP/FEIS does not suggest that the Uintah Basin is solely dependent on mineral extraction for economic vitality. The FEIS discusses the economic contributions of other sectors, including tourism and grazing.</p>	
Thomas M. Power	I-33	SO116	<p>The limited role that mineral extraction can play and the positive role that landscape amenities can play in supporting sustainable local economic development should be carefully considered by the Vernal FO as it makes its decisions about how to manage the public landscapes of the Uinta Basin. Committing almost 100 percent of the landscape to oil and gas development is highly unlikely to represent a rational economic allocation of that landscape. The principle of</p>	<p>The PRMP/FEIS presents a range of alternatives, ranging from an emphasis on conservation of natural resource and environmental protection (especially Alternative E). The BLM's preferred alternative in the PRMP/FEIS recognizes the importance of the oil and gas industry to the economy of the Uintah Basin, but it does not commit "almost 100%" of the landscape to oil and gas development. The proposed plan will add additional</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			diminishing returns would suggest that well before a 100 percent allocation is made to oil and gas development, other landscape values would begin to justify restricting oil and gas development to protect those other important values.	acreage to a more protected status then the preferred alternative.	
Thomas M. Power	I-33	SO117	Limiting oil and gas development in or adjacent to all of the unique natural landscape features of the Uinta Basin is likely to represent a rational economic strategy. It would protect the resources that are most likely to support the diversification of the local economy while costing very little in the way of lost oil and gas potential. The long-term impact of such a strategy is likely to be positive on employment, income, and local government revenues.	See comment response SO116.	
Thomas M. Power	I-33	SO31	I submit the report entitled The Economic Impact of Expanded Oil and Gas Development in Utah's Uinta Basin as my comment on the draft RMP/EIS.	The most recent State-sponsored study on the impact of oil and gas development in the Uintah Basin has been incorporated.	X
Joanna Bettmann	I-34	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Joanna Bettmann	I-34	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives,</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Joanna Bettmann	I-34	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Mary Ann Lewis	I-35	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Mary Ann Lewis	I-35	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2,1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Mary Ann Lewis	I-35	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Joanna Bettmann	I-36	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Joanna Bettmann	I-36	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>disturbed (Table 2,1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Joanna Bettmann	I-36	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Kath M. Anderson	I-37	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Kath M. Anderson	I-37	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
John Gray	I-38	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
John Gray	I-38	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”	
Steve Bremner	I-39	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Steve Bremner	I-39	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”	
Steve Bremner	I-39	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Ravi Grover	I-40	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Ravi Grover	I-40	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”	
Chris Griffin	I-41	GC46 (GC-E)	This is the 21st century, we can all come to table and develop a strategy to guarantee the protection of our national land holdings and still develop oil and gas deposits.	Comment noted.	
James Wesley Winn	I-42	ME100 (ME-L)	Please allow the Uintah Basin to continue to be one of our nations richest producers of energy resources. I support the comments which are being submitted by the Uintah Basin Association of Government.	Comment noted.	
Dustin Perry	I-43	AT18 (AT-J)	Energy production can be done in an environmentally sensitive are with good results. Please approve the alternative that maximizes oil and gas development potential of our area.	Comment noted.	
Bill Batty	I-45	AT19 (AT-K)	I strongly favor the alternatives that give industry the ability to harvest natural gas on the West Tavaputs Plateau, as addressed in the draft resource management plan.	Comment noted.	
John R. Swanson	I-46	SD103	I urge that each of the following streams be designated a National Wild and Scenic River: Allen Draw, Andersen Hollow, Argyle Creek, Ashley Creek, Beaver Creek, Bender Draw, Big Draw, Big Springs, Big Brush	The CEQ regulations (40 CFR 1502.1) require BLM to consider reasonable alternatives, which would avoid or minimize adverse impacts or enhance the quality of the human environment, based on the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Creek, Birch Creek, Bitter Creek, Blair Draw, Bowery Draw, Castle Peak Creek, Clay Basin Creek, Collier Hole Creek, Cow Creek, Crouse Creek, Crow Creek, Crumb Canyon, Cub Creek, Deep Creek, Diamond Gulch, Dry Fork Creek, Duchesne, Dutch John Canyon, East Cottonwood Canyon, Eight Mile Flat Creek, Evacuation Creek, Ford Creek, Four Mile Creek, Galloway Creek, Garden Creek, Gorge Creek, Goslin Creek, Green River, Grindstone Wash, Halfway Hollow Creek, Jack Canyon, Jackson Creek, Jesse Ewing Canyon, Jones Hole Creek, Jones Hollow, Kettle Creek, Lake Creek, Lambson Draw, Little Davenport Creek, Little Brush Creek, Logge Canyon, Lower Water Hollow, Marshall Draw, Martin Draw, Milk Creek, Mill Canyon, Minnie Maud Creek, Mosby Creek, Nine Mile Creek, O-WI-Yu-Kuts Creek, Pariette Draw, Pigeon Creek, Pinnacle Canyon, Pot Creek, Rat Hole, Red Creek, Rock Creek, Sage Creek, Sand Wash Creek, Sears Creek, Sheep Wash Creek, Simons Creek, Smelter Creek, South Branch Diamond Gulch, Spring Creek, Steinaker Creek, Sweet Water Creek, Ten Mile Creek, Tolivers Creek, Twelve Mile Wash Creek, Uinta, Upper Water Hollow, Water Canyon, Wells Draw Creek, West Fork Willow Creek, White River, White Rocks, Willow Spring Draw, Willow Creek (Brown=s Park), Willow Creek (Indian Canyon), and Yellowstone	<p>nature of the proposal and facts in the case (CEQ 40 Most Asked Questions 1b.). While there are many possible management prescriptions or actions, the BLM used the scoping process to determine a reasonable range alternatives that best addressed the issues, concerns, and alternatives identified by the public. Public participation was essential in this process and full consideration was given to all potential alternatives identified.</p> <p>The BLM, in developing the PRMP/FEIS, can chose management actions from within the range of the alternatives presented in the DRMP/DEIS and create a management plan that is effective in addressing the current conditions in the planning area based on FLPMA's multiple-use mandate</p>	
Dale Massey	I-47	SO34 (SO-C)	The RMP does not address national security and the national economy. The products produced in the RMP area have extreme national ramifications in security and economical aspects of the US. All the jobs in the RMP area effect jobs all over the United States either in product transported out of the RMP area or necessary products and equipment transported into the RMP area.	The issues of the national economy and national security are outside the scope of this document.	
Amber Briem	I-48	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
William Huggins	I-49	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
William Huggins	I-49	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”	
William Huggins	I-49	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
John R. Swanson	I-50	SD105	I urge that each of the following areas be designated as wilderness: Bitter Creek (77,000 acres), Bitter Creek-P.R. Springs (88,000 acres), Coyote Basin-Coyote Basin (36,000 acres), Coyote Basin-Kennedy Wash (14,000 acres), Coyote Basin-Myton Bench (42,000 acres), Coyote Basin-Shiner (26,000 acres), Coyote Basin-Snake John (33,000 acres), Four Mile Wash (58,000 acres), Middle Green River (9,000 acres), Lower Green River (13,000 acres), White River Corridor (54,000 acres), Nine Mile Canyon (92,000 acres), Main Canyon (114,000 acres), Browns Park (60,000 acres), Red Mountain-Dry Fork (29,000 acres), Lears Canyon (1,650 acres), Red Creek Watershed (30,000 acres), and Pariette Wetlands (14,000 acres).	See Response to Comment SD103-I-46.	
Scott Schew	I-51	LG93 (LG-E)	The RMP doesn't address how it will adjust grazing if the rangeland health standards are not being met and wildlife or wild horses are the problem. We feel that the BLM is wrong and inconsiderate where it proposes to use a permittee's AUMs that he has in nonuse, as a base for wildlife or wild horse AUMs. This is especially evident after the number of drought years we have	The BLM is not and has not proposed to use a permittees' AUMs in nonuse for wildlife or wild horses. Site specific evaluations which indicate that the loss is due to something other than grazing should also indicate the action which needs to be taken to correct the situation.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			gone through where these extra AUMs have been the lifesavers of both the ranchers and the range.		
Scott Schew	I-51	LG94 (LG-F)	We never saw where or how ADC (animal damage control) was going to be able to operate which is essential to the livestock operations and the wildlife survival especially where lambing, fawning, and sage grouse are concerned. This should be in the RMP.	Table 2.1.26 (Wildlife and Fisheries) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the second paragraph states: "Coordinate with Animal and Plant Health Inspection Service (Aphis) to prepare an annual operating plan for predator control within the planning area."	
Scott Schew	I-51	LG95 (LG-G)	We feel that the BLM is being irresponsible in its opposition to fencing the road ROW when safety, property loss, and range management could all benefit from some fencing and certainly if the range is going to benefit from a fence the BLM should help with the cost.	Comment noted.	
Scott Schew	I-51	LG96 (LG-H)	We feel that the green stripping practice that is currently being done on the desert ranges could be enhanced by allowing the use of a good hardy grass such as crested wheat grass on pipeline ROWs and other reclamation projects and in areas that need some help getting re-vegetation to occur.	Seed mixes for reclamation and revegetation of development areas are determined through project-level development and mitigation plans in order to be specific and appropriate to the area in question. As such, the RMP cannot make sweeping decisions about precisely what mixes will be used.	
Scott Schew	I-51	LG97 (LG-I)	We would like to see an appendix such as Appendix 11 in the Book Cliffs RMP/EIS in the final RMP.	Appendix L in the Draft RMPt provides similar information to Appendix 11 in the Book Cliffs RMP.	
Scott Schew	I-51	SD190 (SD-K)	Some of the proposed actions talk about creating more wilderness areas and ACECs, but we never saw where it addresses improper OHV and other recreation uses within these areas.	The BLM is not proposing to "create" any wilderness areas through the RMP. The BLM will manage existing WSAs and manage for wilderness characteristics on non-WSA lands. Under all action alternatives, OHV use would be restricted to designated routes and open areas. Please, see Figures 21-28 for illustration of the proposed open, closed, and limited OHV areas	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				relative to areas of special designations under each alternative.	
Scott Schew	I-51	SD191 (SD-L)	Coyote Basin should be managed as the Black-footed Ferret Amendment Plan calls for, not as an ACEC.	See Response to Comment SD20-G-25.	
Steven C. Hansen	I-52	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Steven C. Hansen	I-52	AT20 (AT-L)	The draft RMPs Preferred Alternative A leaves out vast archaeologically rich areas that deserve a special management status. A district nomination of Nine Mile Canyon to the National Register of Historic Places is currently in the works and endorsed by the State BLM office. Only SRMA Alternative C would provide a boundary that would adequately protect these extremely sensitive resources that makes this national treasure worthy of such recognition.	The BLM recognizes the important and unique nature of the archaeological record within the Vernal Planning Area. Under current law and policy, the BLM can only assign special designations, and therefore special management, to geographic areas where specific resource values are present, where imminent threats of irreparable harm to those values exist, and where management actions above those of standard BLM practice are necessary to reduce or eliminate those threats. Special designations such as ACECs or SRMAs are not necessary to provide for consideration of cultural resources in land management. Section 110 of the National Historic Preservation Act requires that the BLM proactively manage cultural resources under its jurisdiction that are either listed on or have been determined eligible for listing on the National Register of Historic Places.	
Steven C. Hansen	I-52	SD192 (SD-M)	I urge you to adopt Alternative Cs designation of Nine Mile and Argyle Canyons as an ACEC.	See Response to Comment SD8-G-9.	
Steven C. Hansen	I-52	SD193 (SD-N)	We recommend the BLM designate and manage lower Nine Mile Canyon as a "primitive" wilderness area.	See Responses to Comments SD20-G-25 and SD8-G-9.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Alternative A is inadequate in that it leaves Nine Mile Canyon fully open to mineral extraction and disposal in an area proposed for ACEC designation under the same preferred alternative.		
Steven C. Hansen	I-52	SD194 (SD-O)	An unwaivable NSO policy within 9 mile canyon as well as Desolation Canyon and Diamond Mountain WSA/WIAs should be implemented.	The BLM is not proposing to "create" any wilderness areas through the RMP. The BLM will manage existing WSAs and manage for wilderness characteristics on non-WSA lands.	
Steven C. Hansen	I-52	SD195 (SD-P)	I encourage you to include Nine Mile Creek and Argyle Creek in the National Wild and Scenic Rivers System	See Response to Comment SD19-G-22. Appendix C provides additional information concerning wild and scenic river segments.	
Steven C. Hansen	I-52	SO35 (SO-D)	It is an impediment to Duchesne, Uintah and Carbon Counties, the State of Utah and the American taxpayer in realizing the economic benefits of the fast growing and long lasting heritage tourism industry in this region.	Commenter has not provided any specifics as to where or how the plan's decisions would harm this industry.	
Steven C. Hansen	I-52	TR19 (TR-C)	Routes such as the Sunnyside-Bruin Point route (Carbon Co) should be designated industrial route to the gas and oil fields on the West Tavaputs Plateau. The recent land swap between Hunt Consolidated Inc. and the State of Utah on the East Tavaputs Plateau would facilitate this route, and would also bring a much needed economic boost to the towns of East Carbon and Sunnyside in Carbon Co.	The travel route mentioned lies within Carbon County and within the BLM Price Field Office administrative boundaries.	
Wayne B. Peters	I53	RE13	RE: Figure 27. If your proposal is for more roads than there are in the Southern Utah Wilderness Alliance "Proposed Recreation Spectrum for BLM Vernal Field Office," you need to reduce the amount of roads. There would still be more than enough roads. Also, be careful where you would allow ATVs and motorcycle trail bikes to go.	Comment noted.	
Wayne B. Peters	I-53	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Wayne B. Peters	I-53	AT8	There is only one alternative that comes close and that is Alternative C. Even this alternative needs changes. I'll start with Figure 13, Oil and Gas Leases. Way, way too many leases. Take all the areas in Figures 20, 21, and 24, proposed and current, and allow NO oil, gas, CBM, and mineral development. Make all of the above VRM 1, too.	Comment noted.	
Wayne B. Peters	I-53	GC29	RE: Figure 36. Does this tie in with the President's Healthy Forests Initiative? There is a bit of difference in opinion on exactly how many and what diameter of tree should be chopped down.	Management prescriptions for wood cutting are not tied to the Healthy Forests Initiative but to the national BLM Forest Health and Forest Management Standards and Guidelines.	
Wayne B. Peters	I-53	SO22	You talk about socioeconomics, and how many jobs, and the amount of revenue coming in, but I think there is a conflict. How much does Tourism bring in to the state? It appeared to me that tourism brought in more money, without all of the social conflicts and damage to the environment.	The role of tourism in the economy of the Vernal planning area is discussed in Sections 3.12.2.2.4, 3.12.3.2.4, 3.12.4.2.3, 4.12.2.3, and 4.12.3.3.	
Paul Watts	I-54	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
William Sovehmah	I-55	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Jean Bennett	I-56	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Jean Bennett	I-56	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			obliterated and revegetated.		
Gregory Gnesios	I-58	SO36 (SO-E)	With the benefit of nearby Dinosaur National Monument, and publicity surrounding the Dinosaur Diamond National Scenic Byway, the public lands around Vernal could be attractive to eco-tourism and could bring increased revenue to the area.	The proposed SRMAs, ACECs, existing WSAs and non-WSA lands with wilderness characteristics in proximity to the areas that the commenter noted could enhance the recreation experience of local residents and tourists.	
Matthew Jenkins	I-59	AT21 (AT-M)	I vote for Alternative D.	Comment noted.	
Dale Jenkins	I-60	AT22 (AT-N)	The best alternative for long term interests of the local communities, their economies, the other various interests and the overall ecological health of the lands and waters at issue is Alt C. Alt C also gives the most protection and access to the area's rich archaeological history.	Comment noted.	
Dale Jenkins	I-60	GC34	The current use of the public land is sufficient and has been for years. Do not restrict anyone from using their public lands. Hold those that abuse it accountable. Do not punish us who have used it responsibly. Livestock, yes, OHV yes, limited oil and gas exploration yes. Keep the land open to us who have paid for it in service and hard earned cash. We the public deserve to use the land. It is ours, even us who work in the oil and gas industry, ride OHVs and love to eat beef have rights. I served in the military to protect the right of all to freedom, quit taking it away!!!	Comment noted.	
Sue Knight	I-61	GC33	I am very disappointed in the paltry percentage of land the Draft plan for the Vernal BLM lands puts aside, out of the way of oil and gas exploration. It is very difficult to maintain faith in the BLM as somehow being stewards of the land when, routinely, its administrators rule in favor of poorly restricted resource use and extraction instead of thoughtful planning. Where does this current alternative leave us when any oil or gas	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			reserves are exhausted? They will be, and soon. All exploration that has been done points to isolated and finite reserves, not enough to do much more than swell CEO and shareholder pockets. Pristine public lands will not return to that state if we continue to abuse them. I hope I can count on the BLM as a government agency that thoughtfully defends long term interests.		
John MacDonald	I-62	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Kacy White	I-63	SD188 (SD-I)	I urge that the following streams be designated as a National Wild and Scenic River as they contain outstanding natural qualities: Argyle Creek, Bitter Creek, Evacuation Creek, Lower, Middle & Upper Green, Upper, Nine Mile Creek, and White River.	See Responses to Comments SD14-G-3 and SD8-G-9.	
Hillary Phelps	I-65	SD196 (SD-Q)	I would like to see the area around the Green River continue to be preserved as wilderness with primitive recreation activities. I support that that the Middle and Lower Green River segments be included in the Wild and Scenic River system. I also urge the protection of the Sand Wash launch area.	See Responses to Comments SD8-G-9, SD19-G-22, AND SD20-G-25.	
Aaron Skipwith	I-67	SD3	Include the middle and lower segments of the Green River in the Wild and Scenic River system.	The Lower Green River Segment from the public land boundary south of Ouray to the Carbon County line was identified as suitable for designation in the National Wild and Scenic River System in the Diamond Mountain RMP/EIS and has been carried forward in the Proposed RMP/Final EIS. Appendix C of the PRMP/FEIS details the steps undertaken in the eligibility review process including	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				the identification of outstandingly remarkable values as well as the Suitability Considerations by eligible river segments. The BLM complied with all applicable Federal laws, regulations, and policies in the Wild and Scenic Rivers Study Process.	
Fred Swanson	I-68	ME101 (ME-M)	I would like to see more of a balance between oil and gas development and leaving open space in a natural condition.	Comment noted.	
Fred Swanson	I-68	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Fred Swanson	I-68	SD197 (SD-R)	I would like to see more of the White River and Green River corridors protected from development, including all roadless areas.	See Response to Comment SD8-G-9.	
Karl Holzschuh	I-69	SD197 (SD-R)	I would like to see more of the White River and Green River corridors protected from development, including all roadless areas.	See Response to Comment SD8-G-9.	
Richard Spotts	I-70	SD188 (SD-I)	I urge that the following streams be designated as a National Wild and Scenic River as they contain outstanding natural qualities: Argyle Creek, Bitter Creek, Evacuation Creek, Lower, Middle & Upper Green, Upper, Nine Mile Creek, and White River.	See Responses to Comments SD14-G-3 and SD8-G-9.	
Name Withheld at commentor's request	I-71	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Name Withheld at commentor's request	I-71	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	
Crista Worthy	I-72	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Name Withheld at commentor's request	I-73	SO37 (SO-F)	These are the types of places that bring people like me from out state to visit Utah and spend money there. If the views, open quality of lands, or quiet are destroyed by oil and gas development or motorized vehicles, less of us will visit.	<p>The RMP is not intended to assess impacts to individuals, but to communities or groups. The commenter provides no evidence that the plan's decisions will lead to a decrease in tourism of the sort preferred by the commenter. The nature of alternative formulation in the DEIS attempts to weigh resource conflicts against resource needs, and provides a range of alternatives from an emphasis on conservation to an emphasis on commodity production.</p> <p>The term "multiple use" as defined in the FLPMA means "the management of the public lands and their various resource values so that they are used in the combination that will best meet the present and future needs of the American people." This direction indicates that not all uses need to be accommodated in all areas. The DRMP/DEIS includes a detailed evaluation of all options to ensure a balanced approach. This balanced approach will ensure protection of resource values and sensitive resources while allowing opportunities</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				for mineral exploration and production. The PRMP/FEIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.	
Dave Allin	I-74	AT23 (AT-O)	I am very encouraged that the full development of the Flat Rock Field natural gas resources would be enabled under Alternatives A, B, and C that would allow oil and gas leasing of the split estate land. The "no action" Alternative D would continue the status quo that has left Federal Minerals T1-15S, R17-20E with known productive potential to remain undrilled and unproductive.	Comment noted.	
Dave Allin	I-74	AT24 (AT-P)	The US needs a reliable long-term supply of natural gas, and to that end, Alternatives A and B would be the most accommodating.	Comment noted.	
Name Withheld at commentor's request	I-75	ME96 (ME-H)	We are very concerned about the obvious bias towards mineral and energy development in the DEIS. Not only does this affect the rivers in the Vernal area, but it has an overall detrimental impact to the surrounding environment that is not clearly studied in the DEIS. The bias towards mineral exploration and development is made obvious by a quick glance at the "Impacts of Mineral Decisions on Riparian Resources (4.11.2.5) section.	Comment noted.	
Name Withheld at commentor's request	I-75	ME96A (ME-H)	The "environmentally sensitive" Alternative C actually allows more leasing than the "no action" alternative D.	See comment response ME136.	
Candee Pearson	I-76	TR20 (TR-D)	The amount of roads for motorized use is appalling, 5,000 miles is way too much. What about non-motorized use?	Management decisions for recreation, which includes both motorized and non-motorized use, can be found in Table 2.1.13 (Recreation Resources) of the PRMP/FEIS.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment response RE20.	
Jack A. Smith	I-78	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Jack A. Smith	I-78	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Jack A. Smith	I-78	TR21 (TR-E)	Unlike the BLM's proposals, the Greater Dinosaur/Book Cliffs Heritage Plan also offers a logical and reasonable travel management plan that will allow off-highway vehicle recreation while protecting important lands. This is a serious issue that needs to be addressed now and not at a later date.	See comment response AT1.	
R. L. Laffoon	I-79	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
R. L. Laffoon	I-79	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
June Anna-Fey	I-80	GC45 (GC-D)	I request that the BLM do all in its power to prevent temporary and permanent abuse of the region through oil and gas extraction, and through the destruction inevitably and universally caused by nearly all off road vehicles and their users.	Comment noted.	
Sara L. Bein	I-81	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Sara L. Bein	I-81	AT25 (AT-Q)	The BLM's preferred alternative should not designate routes or allow for oil and gas leasing in areas with	As outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			wilderness characteristics.	<p>Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes.</p> <p>BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.</p> <p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness characteristics using other prescriptions to protect</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses.</p>	
Sara L. Bein	I-81	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Bert DeLambert	I-82	LG98	I would like to comment on the proposed wild horse herd to be put on Winter Ridge. In my opinion there is	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
		(LG-J)	not sufficient forage to maintain a herd of 60-110+ horses year round.		
John R. Swanson	I-83	SD106	This area contains outstanding biological, scenic, and roadless wilderness attributes of certain national significance and should be established as a preserve to ban off-road vehicles as they destroy soil, water, and air resources and to eliminate oil and gas activities as they decimate wildlife, fish, and plant resources. I urge that each of the following areas, as located only in Utah, be designated as wilderness: Book Cliffs Mountain Browse ISA (670 acres), Bull Canyon (5,100 acres), Daniels Canyon (16,000 acres), West Cold Springs (5,500 acres), Winter Ridge (70,000 acres), Cold Spring Mountain (17,000 acres), Cripple Cowboy (27,000 acres), Desolation Canyon (380,000 acres), Moonshine Draw (6,400 acres), White River (32,000 acres), Wild Mountain (17,000 acres), Bitter Creek (55,000 acres), Bitter Creek/Rat Hole Ridge (24,000 acres), Bourdette Draw (30,000 acres), Diamond Mountain (46,000 acres), Hells Hole Canyon (42,000 acres), Lower Bitter Creek (24,000 acres), Lower Flaming Gorge (33,000 acres), Red Creek Badlands (6,100 acres), Sweetwater Canyon (16,000 acres), and Wolf Point (28,000 acres).	See Response to Comment SD103-I-46.	
Lo I and Won Yin	I-84	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Lo I and Won Yin	I-84	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the	See comment response AT1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.		
Lo I and Won Yin	I-84	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lo I and Won Yin	I-84	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lo I and Won Yin	I-84	TR21 (TR-E)	Unlike the BLM's proposals, the Greater Dinosaur/Book Cliffs Heritage Plan also offers a logical and reasonable travel management plan that will allow off-highway vehicle recreation while protecting important lands. This is a serious issue that needs to be addressed now and not at a later date.	See comment response AT1.	
James and Elizabeth Robinson	I-85	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
James and Elizabeth Robinson	I-85	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
James and Elizabeth Robinson	I-85	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
James and Elizabeth Robinson	I-85	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Claire Martineau	I-86	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Claire Martineau	I-86	AT13 (AT-E)	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Claire Martineau	I-86	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Susan Matti	I-87	RE25 (RE-E)	Referring to Red Mountain-Dry Fork Complex: The OHVs are loving the area to death. Your lack of limitation on the area use is just creating roads everywhere. With that comes significant erosion of soils, disruption of the deer and elk habitat and	For clarification, please compare Figure 24 and Figure 27. The commenter should note that the Red Mountain Dry Fork ACEC boundaries extend beyond the closure indicated on Figure 27.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			diminished beauty to a unique area. The map on figure 27 indicates that Alt C would close the area to OHV use, but the words on pg. 2-56 state that there would be limited OHV use. Which is it?		
Peter Robinson	I-88	TR22 (TR-F)	If at all possible, it would be best to restrict ATV usage to existing roads; and hopefully, restrict the number of roads present. I realize that this may be politically impossible, but if the issue is not raised it will never be discussed. I suggest that the construction of new roads be as limited as the situation permits. The same philosophy has already been used by BLM in the placement of energy ROWs (pipelines, powerlines).	Comment noted.	
Merrill Bitter	I-89	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Merrill Bitter	I-89	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Curt A. Livingston,	I-90	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands.	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Sr.			Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Curt A. Livingston, Sr.	I-90	AT4	The preferred alternative should not designate off-road vehicle routes in areas that could be protected and enjoyed as wilderness, including Upper Desolation Canyon, White River, Wolf Point and the lands surrounding Dinosaur National Monument.	Comment noted.	
Eric Rechel	I-91	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Beverly Greenhow	I-92	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Beverly Greenhow	I-92	AT14 (AT-F)	<p>The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.</p>	<p>See comment response AT1.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Bill Ingalls	I-93	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Randy Long	I-94	GC47 (GC-G)	Wilderness needs to prevail and all roads need to be left as they are.	Comment noted.	
Liz Thomas	I-95	ME101 (ME-M)	I would like to see more of a balance between oil and gas development and leaving open space in a natural condition.	Comment noted.	
Liz Thomas	I-95	RE26 (RE-F)	ORV routes are located so that there is absolutely 0% of the VFO area farther than 3 miles of a route and approximately 95% of the VFO area is w/in 2 miles of a route. Please reconsider so that there are areas for non-motorized recreation.	Comment noted.	
Tom Groene	I-97	AT26 (AT-R)	Close Utah Wilderness Coalition proposal to leasing and ORV's	Comment noted.	
Tom Groene	I-97	ME102 (ME-N)	No leasing except NSO until you've conducted site specific NEPA	Comment noted.	
Tom Groene	I-97	RE27 (RE-G)	No ORV routes open until you've determined that route meets Executive Orders controlling ORVs as well as BLM regulations.	As stated in Table 2.1.15 (Recreation – Travel Maintenance and Development), Section 2.4.14, the goals and objectives for OHV activities for all the action alternatives would comply with the BLM's National OHV Policy. This policy (regulated under	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				43 CFR 8340) established management areas as either "open," "limited," or "closed" to OHV use.	
Bryon Brown	I-98	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Bryon Brown	I-98	GC50 (GC-I)	Why are we trying to evaluate alternatives when most of the VFO has already been leased out to oil and gas companies? Realistically, the BLM is only allowing us limited input on the 30% of the VFO that will not be degraded by oil and gas. This is like putting the cart before the horse.	Comment noted.	
Vicki Stamper	I-99	AQ10	EPA's modeling guidelines generally call for an analysis of worst case impacts for new sources.	In BLM's opinion, EPA's Guideline on Air Quality Models (GAQM) does not call for a worst-case analysis for all modeling exercises. See comment responses AQ9 and AQ31. Furthermore, NEPA no longer requires a "worst-case" analysis.	
Vicki Stamper	I-99	AQ11	Under NEPA, the BLM is to provide a 'full and fair discussion the significant environmental impacts' that could occur as a part of the DRMP. Accordingly, the BLM should have considered topography in its near-field assessment and determined a hypothetical placing of wells and other associated air pollution sources that would result in worst case ambient impacts. The BLM's air quality analyses are flawed with such consideration of the terrain of the Vernal Field Office area.	See comment response AQ9.	
Vicki Stamper	I-99	AQ12	The group of air pollution sources modeled in the near-field analysis was too small to reflect the maximum impacts that could occur. Specifically the BLM modeled only 25 well pads and associated air emissions sources. However, Appendix D of the August 2004 Air Quality Assessment Report for the Vernal and Glenwood Springs Resource Management Plans (2004 Air Report) indicates that 4,256 wells	The near-field analysis generally followed the accepted methodology from a previous analysis for the Glenwood area (NPS, 1998) performed for BLM. The near-field analysis was intended to look at impacts in the vicinity of a representative set of sources, and was not intended to be a cumulative analysis. The cumulative impacts analysis was performed with the CALPUFF model and the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			would be allowed under the Preferred Alternative A. The BLM's analysis only looked at less than 1% of the total development that could occur under the DRMP/EIS along with reasonably foreseeable gas development in the area.	appropriate BLM and inventory sources.	
Vicki Stamper	I-99	AQ13	Figure A-57 of Appendix A of the 2004 Air Report indicates that the area of significant impact (i.e., defined by EPA as the area with at least 1µg/m3 impact on an annual average) from just the sources modeled extends at least 3 kilometers away from the group of sources modeled (and probably farther than that but the distance could not be readily discerned from Figure A-57). Many additional groupings of wells and associated air emissions sources could be located in the significant impact area of the sources modeled, which would clearly compound the overall air pollutant concentrations.	<p>The commenter apparently misread the figure. This figure shows potential maximum near-field impacts of annual average NOx concentrations. The EPA Significant Impact Levels (SIL) were not a part of this graphic.</p> <p>EPA's SILs are intended for use in PSD permit analyses (EPA, 1991) and hence were not used in the near-field NEPA analysis. Also, the construction activities included in the near-field analysis are temporary in nature and thus, the comparison to the SILs is not applicable.</p>	
Vicki Stamper	I-99	AQ14	To determine whether ambient air quality standards will be violated due to the DRMP, a much larger and more extensive potential maximum emissions scenario should be developed and modeled, along with a consideration of topography of the Vernal Field Office are as discussed above.	<p>See comment responses AQ8, AQ9, and AQ12.</p> <p>BLM would welcome a cooperative, multi-agency ozone modeling exercise focused on oil and gas development in the Western U.S.</p>	
Vicki Stamper	I-99	AQ15	As stated in the definition of "Significantly" at 40 CFR § 1508.27, 'significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by... breaking [an action] down into small component parts.' The EIS is required to include an analysis of significant environmental consequences, pursuant to 40 CFR §§ 1502.1 and 1502.16, and thus the RMP/EIS must include an adequate analysis of the cumulative impacts on air quality.	<p>See comment responses AQ9 and AQ12.</p> <p>BLM's 2-tiered analysis approach does not "break [sic] [an action] down into small component parts" to avoid significance. The analysis addressed both the potential local (near-field) and distant (far-field), including a cumulative analysis.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Vicki Stamper	I-99	AQ16	<p>The DRMP EIS Did Not Justify the NOx Emission Rate from Compressors Modeled in the Near Field Analysis. The near field modeling analyses for the DRMP/EIS assumed a NOx emission rate of 1.5 gram per horsepower-hour (g/hp-hr) for compressor engines. However, a large part of the Vernal Field Office area is within the exterior boundaries of the Uintah and Ouray Indian reservation and is actually considered to be in "Indian Country." As a result, sources locating in that region will be subject only to Federal new source permitting requirements with the Environmental Protection Agency as the permitting authority.</p> <p>Unfortunately, EPA only has preconstruction permit requirements for new and modified major stationary sources (i.e., the prevention of significant deterioration (PSD) permitting program). It is likely that many of the compressor engines added as a result of the Vernal RMP and other reasonably foreseeable development will not be subject to PSD permitting requirements because the engines will be considered minor sources. This means that no air quality permit will be required, no emission limits will be required, and no ambient air quality analysis will be required. Thus, there is no support for the concept that compressor engines in the Vernal Field Office area will be subject to a NOx emission rate of 1.5 g/hp-hr, much less the 0.7 g/hp-hr assumed for Utah sources in the CALPUFF analysis.... At a minimum, the BLM should have evaluated the NOx emission rates of recently installed compressor engines in "Indian Country" (quotes added) in the region, to get an idea of a reasonable NOx emission rate to model. Without adequate justification showing that the assumed 1.5 g/hp-hr NOx emission rate will actually apply or be met by most new compressor</p>	<p>See comment response AQ9 regarding worst-case analyses.</p> <p>It is not within BLM's authority to correct perceived weaknesses in State or Federal air quality regulations.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			engines in the Vernal Field Office area, the BLM should have assumed the worst case NOx emission rate or, at the minimum, a more realistic NOx emission rate.		
Vicki Stamper	I-99	AQ17	The Near-Field Analysis Used Different Compressor Stack Parameters than Used in the Far-Field Analysis, Which Likely Meant the NO2 Concentrations Were Underestimated in the Near-Field Analysis Table 3-19 (page 34 of the 2004 Air Report) shows the stack parameters used for compressors in the near-field analysis, and the parameters vary greatly from the compressor stack parameters used in the far-field analysis (see Table 3-10, page 23 of 2004 Air Report) or the parameters identified as typical for compressor engines in Table 3-4 of the 2004 Air Report (page 18 of 2004 Air Report). Specifically, the near-field analysis assumed a compressor stack height of 1.83 meters (m), an exit velocity of 1.83 meters per second (m/s), ambient temperature of the plume (294.3 K), and a stack diameter of 0.13 m. The far-field analysis used stack parameters for compressors of 6.1 m stack height, 0.9 m stack diameter, 30 m/s exit velocity, and 755 K exit temperature, which appear to be much more appropriate for compressor engines. These differences could have resulted in lower modeled concentrations, and thus the modeling must be redone with the correct compressor engine stack parameters.	Table 3-19 of the 2004 Air Report has been revised to correct the errors. However, the modeling was done with the correct source parameters and does not need to be redone.	X
Vicki Stamper	I-99	AQ18	The near-field analysis did not provide a thorough review of particulate matter impacts because it appears that the analysis underestimated particulate emissions from roads and from construction. There were 25 well pads assumed in the group of sources modeled in the near-field analysis and there will be a road going to each pad. Yet, the BLM only modeled emissions from one unpaved road traversing diagonally – the shortest distance - through the source area. Such an approach	All particulate emissions were accounted for in the modeling. Separate modeling runs were conducted for road emissions only at the request of EPA Region 8. All road emissions for the appropriate length of road associated with 25 pads were combined into the sources used to represent the single road; this reduces model run times.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			greatly underestimated the mileage of roads, which would result in an underestimate of emissions. This problem is magnified by the fact that the BLM did not model a large enough group of sources to adequately reflect maximum near field air impacts.	See comment response AQ9.	
Vicki Stamper	I-99	AQ19	The 2004 Air Report does not identify what the BLM assumed for vehicle miles traveled for the modeling of the unpaved road to determine whether a sufficient level of traffic was modeled.	This information was, and is, available on the 2-CD set containing the TSD and associated tables, attachments and appendices, and modeling files by request from the BLM NSTC.	
Vicki Stamper	I-99	AQ20	It appears that the well pad construction emissions were underestimated. It is difficult to determine precisely what was modeled, but it seems questionable whether the well pad construction emissions listed in Table 3-21 of the 2004 Air Report include emissions due to construction traffic on unpaved roads	Construction and construction vehicle traffic was included in the analyses	
Vicki Stamper	I-99	AQ21	Possibly the emissions only represent tailpipe particulate emissions?	Tailpipe emissions were not included in the analysis.	
Vicki Stamper	I-99	AQ22	As a comparison to the recently released Rawlins DRMP/EIS, the BLM used much higher emission factors for PM-10 emissions from well pad construction for the Rawlins analysis. Specifically, just the PM-10 emissions for road dust generated from construction equipment were estimated to be approximately 0.0227 grams per second in the Rawlins emissions inventory, whereas the BLM assumed PM-10 emissions from well pad construction and related traffic to be only 0.0000004946 grams per second for the Vernal DRMP analysis. (Information on well pad construction emissions was derived from the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS.)	No modeling was done for the Rawlins RMP EIS, so the accuracy of the stated figure for PM-10 emissions cannot be verified. The quoted emission rate from the Vernal analysis is in grams per second per square meter (g/s-m ²). Converting back to grams per second yields a figure of 0.004 g/s. Further, the Rawlins analysis has thousands more wells than the Roan Plateau analysis.	
Vicki Stamper	I-99	AQ23	While the BLM placed receptors within close proximity to the road when only modeling impacts from the road, there were no receptors within the modeled well field area for the modeling assessment of all particulate	A separate analysis of the impacts from the road only was done at the request of EPA Region 8. To address the comment regarding the placement of receptors, and to update the near-field analysis to	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>matter impacts (i.e., due to roads, well construction, and operation). Because most of the particulate emissions are fugitive emissions, the highest impacts will occur within close proximity to the sources. Thus, to provide a complete picture of the ambient air particulate matter impacts that could occur as a result of all particulate sources, receptors should have been included within the grouping of wells, as well as outside of the grouping of wells.</p>	<p>reflect site-specificity, the near-field analysis was updated. The changes made in the analysis are outlined at the end of this document. Please note that the essentials of the analysis (5 x 5 well matrix, etc.) have not changed.</p>	
Vicki Stamper	I-99	AQ24	<p>The Near Field Analysis Failed to Include an Analysis of Impacts from Construction Vehicle Engines or Drilling Rigs</p> <p>The near-field analysis apparently did not evaluate the air impacts from construction vehicle engines or drilling rig engines. With respect to drilling rigs, the DRMP/EIS states that these sources were screened out as insignificant (page 4-35 of DRMP/EIS). Based on the data provided in 2004 Air Report, the BLM only evaluated particulate emissions from construction and drilling traffic. Table 3-21, page 35 of 2004 Air Report. (As stated above, it is not clear whether the analysis of traffic was of road dust particulate emissions or tailpipe emissions). Drilling rigs, as well as construction equipment, will most likely be powered by diesel engines, and thus emissions of SO₂, NO_x, and CO should have also been evaluated from these engines. The emissions inventory developed for the Rawlins DRMP/EIS shows significant emissions from drilling operations alone, as well as from other well pad construction equipment. The BLM should not have exempted these sources from the near-field analysis based on presumed insignificance. Further, as stated in the definition of "Significantly" in the NEPA regulations at 40 C.F.R. § 1508.27, "significance exists</p>	<p>Vehicle tailpipe emissions were not included in either the near- or far-field analyses. The drill rig engines were excluded based on preliminary emissions calculations performed by NSTC Air Quality staff. The near-field analysis is not and was not intended to be "cumulative analysis".</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by. ..breaking [an action] down into small component parts." Thus, the DRMP/EIS is deficient in not evaluating all of the potential air impacts due to these sources.</p>		
Vicki Stamper	I-99	AQ25	<p>It appears that the BLM greatly underestimated the NOx emissions due to natural gas flaring for the Vernal DRMP/EIS. Specifically, the 2004 Air Report indicates that a NOx emission rate of 0.0098 grams per second was assumed for flaring emissions. (Table 3- 24, page 42 of 2004 Air Report). That emission rate, as with all other flaring emission rates, was based on emission rates from "NPS, 1988." For the recently released Rawlins DRMP/EIS, the BLM used much higher emission factors for NOx emissions from flaring. Specifically, the BLM used a NOx emission rate of approximately 0.0850 grams per second for flaring emissions for the Rawlins DRMP/EIS, which is more than eight times the emission rate assumed by the BLM in the Verna1 analysis. (Information on flaring emissions is detailed in the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS, and according to the documentation provided, the NOx emission rate was based on EPA's Compilation of Air Pollutant Emission Factors (AP-42), Volume I, section 13.5 Industrial Flares.)</p>	<p>The flare modeling was conducted as a separate exercise using the SCREEN3 model, as recommended during stakeholder meetings. The SCREEN3 model is a simple, single-source Gaussian plume model with a pre-determined matrix of meteorological conditions. The model is also linear with respect to emission rate. Therefore, a doubling of the modeled emission rate gives a doubling of the resulting concentrations. Examining the flare modeling results and the maximum concentrations listed in Table 5-73, an increase in emissions by a factor of eight, assuming such an exercise is valid, still yields extremely small concentrations. Therefore, further modeling is not required.</p>	
Vicki Stamper	I-99	AQ26	<p>The BLM did not estimate any volatile organic compound (VOC) emissions from flaring. Yet, for the Rawlins DRMP/EIS, the BLM estimated that VOC emissions based on 2 days of flaring would equate to 1,262 pounds of VOCs per well over a two day period. This is hardly an insignificant amount of emissions. The VOC emissions from flaring should have been estimated and the resulting potential impacts on air</p>	<p>Emission factors were taken from EPA's AP-42, volume 1, chapter 13.5, and did not include VOCs.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>quality (including impacts on hazardous air pollutant concentrations) should have been evaluated. (Information on flaring VOC emissions is detailed in the Rawlins "Emissions CD" associated with the Rawlins DRMP/EIS). Thus, the flaring emissions and air analyses should have more accurately reflected NOx emissions and should have included an evaluation of VOC (including hazardous air pollutant) emissions.</p>		
Vicki Stamper	I-99	AQ27	<p>The estimate of the Number of Compressors Engines Used in the CALPUFF Modeling Seems to be in Error. The CALPUFF analysis, done primarily for the far-field modeling assessment, assumed that at most only 69 compressor engines would be necessary for the full development allowed under the Vernal DRMP along with other reasonably foreseeable gas development in the area. (Table 3-8, page 22 of the 2004 Air Report, as well as Table D- 10 of Appendix D of the Air Report). There are several flaws in this analysis.</p> <p>This total number of needed compressors conflicts with Table A-4 of the Vernal DRMP/EIS (page 4-5), which includes projected numbers of compressors from oil and gas development on all lands within the Vernal Field Office Area. Specifically, Table A-4 indicates a total of 167 compressor stations will be needed due to future mineral production activity in the Vernal Field Office area. It is not clear what size of compressor stations was assumed for the date in Table A-4 -clearly if it was smaller than 1,000 horsepower (as assumed in the Air Report), then more compressor engines would be needed. However, if smaller compressor engines were projected, then this calls into question the assumed 1,000 hp size of all compressors for the Air Report and analyses. Assuming larger compressor engines would mean the compressor engines would be</p>	<p>The commenter has misinterpreted Table A-4. The units for the line "Compressor Stations" are acres, not number of stations (See Column headings of table).</p> <p>The 2004 Air Report has been revised to change the table number so that it is consistent with the other tables in Chapter 4.</p>	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>more dispersed, thus likely resulting in lower near- field impacts. But, if more numerous, smaller compressor engines are expected, this should be modeled to reflect maximum potential near field impacts. In any case, the number of compressor engines modeled for the Vernal air analysis needs to be reconciled with the projection of more than double the amount of compressor stations in Table A-4 of the DRMP/EIS.</p>		
Vicki Stamper	I-99	AQ28	<p>There appears to be a major miscalculation of the number of compressor engines that will be needed, considering the "rule of thumb" applied (as discussed on page 21 of the Air Report) that 1,100 horsepower (hp) is needed to move 10 million cubic feet per day (MCF/day) of gas and also considering that, currently, 28,000 hp is used (via 35 compressors) to move 225 MCF/day (as discussed in Tables D-7 through D-10).</p> <p>According to the calculations provided in the Air Report and Appendix D, under the preferred Alternative A, the maximum predicted gas production from all reasonably foreseeable development will be 226,265,311 MCF/year. This is equivalent to 619,905 MCF/day. Thus, the production is projected to rise to more than 1,000 times the amount of gas being produced in the basin today, yet the number of compressor engines at 1,000 hp each is only projected to increase by roughly 2.5 times the current horsepower used to move the current production of 225 MCF/day. This clearly makes no sense. Using the "rule of thumb," based on the projected gas production, the number of compressors needed for full development at 1,000 hp each would be over 68,000. It is not clear whether this result makes sense either and thus possibly the total maximum projection of gas production is in error?</p>	<p>The commenter has made 2 mistakes in the units of her calculation. First, the quote "10 million cubic feet per day (MCF/day)" should be 10,000 MCF/day. Second, the basin wide production quoted as 225 MCF/day should be 225 MMCF/day. (Note: A million is equivalent to MM and a thousand is equivalent to M.)</p> <p>Using the correct values, the calculation is as follows:</p> <p>$(1100 \text{ HP}/10,000\text{MCF per day}) * 619,905 = 68,189 \text{ HP}$ or 68 1000HP compressors.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>In any case, the estimate in the Air Report of the number of compressors needed for the maximum development scenario means that, considering the development of Alternative A of 4,265 wells (per Table D-8 of Appendix D of 2004 Air Report), there would be one compressor engine (of 1,000 hp) for every 63 wells. This does not seem sufficient, especially given current levels of development and current number of compressor engines. This also is much less conservative than the assumption for the near field analysis which assumed six 1,000 hp compressor engines for 25 well pads.</p> <p>Thus, the analysis of the total number of compressor engines needed for each alternative needs to be checked for errors and recalculated. As it currently stands, it appears that the estimate of compressor engines is greatly underestimated, which would then result in a significant underestimate of ambient air impacts due to these sources. The air quality analysis for the Vernal DRMP cannot be relied on until this issue is resolved.</p>		
Vicki Stamper	I-99	AQ29	<p>There is No Support for the Assumed NOx Emission Rate for Compressor Engines in the Vernal Field Office Area.</p> <p>According to the 2004 Air Report, the assumed for new compressors in Utah was 0.7 g/hp-hr, based on the "stringent [Best Available Control Technology] limits in Utah." (Page 22 of 2004 Air Report). However, Utah will not likely be the permitting authority for the majority of compressor engines permitted in the Vernal Field Office area because a large part of the Vernal Field</p>	BLM used the 0.7 g/hp-hr NOx emission rate at the request of the Utah DEQ. BLM believes that using "uncontrolled NOx emissions from compressors in the Vernal Field Office area" would not be appropriate and not in accord with NEPA and CEQ regulations, which no longer require a "worst-case" analysis.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Office area lies within the exterior boundaries of the Uintah and Ouray Indian Reservation, which means that the EPA will be the permitting authority and Federal, not Utah, permitting regulations will apply to most compressor engines in the area. As discussed above, EPA's preconstruction permit requirements only apply to new and modified major stationary sources (i.e., the PSD permitting program). It is likely that many of the compressor engines added as a result of the Vernal RMP and other reasonably foreseeable development will not be subject to PSD permitting requirements because the engines will be considered minor sources. This means that no air quality permit will be required, no emission limits will be required, and no ambient air quality analysis will be required. Thus, there is no support for the concept that compressor engines in the Vernal Field Office area will be subject to a strict NOx emission rate of 0.7 g/hp-hr. Indeed, the NOx emission rates from unpermitted compressor engines are likely to be several times greater than that assumed for the Vernal DRMP air quality analyses.</p> <p>The BLM should have evaluated the NOx emission rates of recently installed compressor engines in Indian Country in the region, to get an idea of a reasonable NOx emission rate to model. Without adequate justification showing that the assumed 0.7 gm/hp-hr NOx emission rate will actually apply or be met by most new compressor engines in the Vernal Field Office area, the BLM should have assumed uncontrolled NOx emissions from compressors in the Vernal Field Office area.</p>		
Vicki Stamper	I-99	AQ31	The CALPUFF Air Quality Modeling Analysis Failed to Model At Least Three Years or Meteorological Data as	EPA Guideline on Air Quality Models (GAQM) is just that; a guideline; it is not regulation. Further, the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Required by EPA Regulations.</p> <p>The CALPUFF air quality modeling analysis only used one year of mesoscale meteorological data from 1996. (Page 46 of the 2004 Air Report.) However, common practice and EPA's Guideline on Air Quality Models requires use of at least three years of mesoscale meteorological data or five years of National Weather Service (or comparable) data when evaluating long range transport of air emissions. See Section 9.3.1.2.d. of 40 C.F.R. Part 51, Appendix W. As stated in EPA's Guideline on Air Quality Models, "The model user should acquire enough meteorological data to ensure that worst-case meteorological conditions are adequately represented in the modeling results." (Section 9.3.1.1 of 40 C.F.R. Part 51, Appendix W.) EPA's recommendation to ensure this mandate is met is to use three years of mesoscale meteorological data or five years of other meteorological data to adequately reduce the variability in model estimates due to meteorological data. Thus, the BLM's CALPUFF air quality analysis does not meet these current standards for air quality modeling demonstrations.</p>	<p>GAQM is primarily intended for application in a regulatory setting and is not necessarily applicable to NEPA.</p>	
Vicki Stamper	I-99	AQ32	<p>The Use of Background Concentrations To Reflect Existing Source Impacts Is Flawed and Unjustifiable.</p> <p>The cumulative CALPUFF air quality analysis relied on background concentrations (which were not always based on monitored concentrations) in defining which sources needed to be inventoried and included in the modeling. (page 16 of the 2004 Air Report). That is, any source in existence and operating prior to the "monitoring baseline date" (which varies from 2000 to 2001) was generally considered to be reflected in the</p>	<p>The background data for the Vernal AQ analysis were provided by the Utah DEQ and represent, in the DEQ's opinion, the best available data to represent the existing air quality in the Vernal RMPA. The background air quality data, for this or most modeling analysis, are not intended to, nor should be "maximum pollutant concentrations", but are intended to be representative of the area under analysis.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>background monitoring data and thus was not inventoried or included in the cumulative modeling assessment. According to Table 5-3 of the 2004 Air Report, the data that were considered to reflect all sources in existence prior to 2000 or 2001 were either estimates from the Utah Division of Air Quality (UDAQ) or did not necessarily reflect maximum pollutant concentrations in the Vernal Field Office area. For example, for NO₂, a background concentration provided by UDAQ of 10 µg/m³ was used, although it is not clear how this concentration was derived. Similarly, a background concentration provided by UDAQ was used for PM-10 concentrations. For SO₂, data collected almost 10 years ago were used as reflecting existing sources, and for CO, data collected in Grand Junction, Colorado were used. To assume that any of this monitoring data or recommended background values are reflective of existing source impacts in the Vernal area or at the Class I areas modeled is farfetched without an analysis to indicate that the concentrations are reflective of the maximum concentrations for the Vernal project area and the other areas modeled.</p> <p>To justify the use of any monitoring data as reflective of maximum concentrations in an area, an analysis should have been done to show that the monitor in question is representative of maximum concentrations for the area based on existing stationary, mobile and area sources. Considering that the CALPUFF analysis was used to predict air impacts at various locations such as Class I areas, the monitoring data would have to be shown to be representative of maximum concentrations for all of those various locations as well. Further, the monitoring data should have been</p>		

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			evaluated to determine whether the monitors meet EPA's criteria in 40 C.F.R. Part 58 for site selection and sampling frequency, and whether the monitoring data has been quality assured and adjusted for missing data.		
Vicki Stamper	I-99	AQ33	Regarding the background concentrations recommended by UDAQ, it is not clear how these values could be considered as reflective of all existing sources in the region unless these background concentrations were derived from modeling all existing sources and reflect the existing sources' maximum impacts in all areas modeled.	See comment response AQ32.	
Vicki Stamper	I-99	AQ34	The approach of assuming certain sources were reflected in background concentrations is also not consistent with current practice for analyzing emissions impacts. Background air monitoring data is generally added to the results of a cumulative source modeling analysis in determining compliance with the national ambient air quality standards (NAAQS). However, as discussed in EPA's Guideline on Air Quality Models, if the source being modeled is not isolated, as is the case in this modeling assessment, then modeling of existing sources is necessary to determine the potential contribution of background sources. See Section 9.2.1 of 40 C.F.R. Part 51, Appendix W.	This approach has been used in numerous previous BLM air quality analyses and was agreed upon by the stakeholders group during the protocol development process. See comment response AQ31 regarding the GAQM.	
Vicki Stamper	I-99	AQ35	The NAAQS were set to protect the public and the environment from the adverse effects from air pollution. Thus, in determining whether these air quality standards might be exceeded as a result of the BLM's proposed action, the DRMP/EIS must use, or develop via modeling, background concentrations that are truly representative of the maximum concentrations that are currently occurring. Only then will the public be provided with a decent understanding of whether public	See comment response AQ32.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>health and welfare will be protected or whether it will be adversely affected as a result of the Vernal DRMP on top of all other air emissions sources in the region. Without such an analysis, the DRMP/EIS must make clear that there really is no "cumulative" analysis that was done for the DRMP. Instead, the "cumulative" analyses mainly represent impacts due to new growth in air emissions including the proposed RMP sources.</p>		
Vicki Stamper	I-99	AQ36	<p>The DRMP/EIS Failed to Include a Proper Cumulative PSD Increment Analysis.</p> <p>The DRMP/EIS did not include a proper cumulative evaluation of prevention of significant deterioration (PSD) increment consumption. While the DRMP/EIS did include certain sources that have either begun operation or had been modified since the "monitoring baseline date," the analysis did not include ml sources which consume the available PSD increment. In general, those sources which commenced construction or which have increased emissions after the applicable PSD "minor source baseline date" consume the available increment. Major sources which commenced construction after the major source baseline date also consume the available increment. [See definition of "baseline concentration" in 40 C.F.R. 52.21(b)(13).] To determine the inventory necessary to assess whether Vernal sources will cause or contribute to PSD increment violations, the PSD minor source baseline dates for the area should have first been determined. The PSD baseline dates define the sources that need to be modeled, and thus using background monitoring concentrations does not provide a realistic analysis of increment consumption.</p>	<p>Section 4.2.2.6.4 in the PRMP/FEIS has been revised to replace the phrase "monitoring baseline date" with "monitoring base year" in order to avoid confusion with the term "baseline" as used in conjunction with PSD. The 2nd sentence of this section now reads as follows:</p> <p>"The first group referred to as "inventory sources", included new and modified emission sources that have commenced operation since the monitoring base year date."</p> <p>The analysis of increment consumption is the sole responsibility of State air agencies that have been delegated authority by EPA under the Clean Air Act.</p>	X
Vicki	I-99	AQ37;	The Emission Inventory Is Flawed Because the	BLM's modeling contractor (Trinity Consultants)	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Stamper		AQ38; AQ39; AQ40; AQ41; AQ42; AQ43, AQ44	<p>Inventory Sources Were Modeled at Annual Average Emission Rates Regardless of the Averaging Time of the Air Standard in Question.</p> <p>According to the 2004 Air Report, annual average emission rates were modeled for inventory sources for compliance with both short term and annual air standards. (Page 17 of the 2004 Air Report). No justification or reason was provided for this deviation from EPA -required modeling standards.</p> <p>EPA's modeling guidelines make clear that determinations of compliance with short term ambient standards require that averaging times for emission rates modeled reflect the averaging time of the standard being protected. Specifically, Section 11.2.3.3 of 40 C.F.R. Part 51, Appendix W, provides as follows:</p> <p>[S]equential modeling must demonstrate that the allowable increments are not exceeded temporally and spatially, i.e., for all receptors for each time period throughout the year(s) (time period means the appropriate PSD averaging time, e.g., 3-hour, 24-hour, etc.)</p> <p>Use of annual average emission rates will, in most cases, ensure an underestimate of emissions that could be affecting compliance with short term standards, such as for SO₂ (for which there are 3-hour and 24-hour average standards and PSD increments) and PM-10 and PM-2.5 (for which there are 24-hour average standards), as well as the visibility</p>	<p>agreed, during a telephone conference call on 4/18/03 with the air quality stakeholders, to attempt to locate CEM data for the "large inventory sources" to derive short-term emission rates, while using annual rates for smaller sources. However, little of this data was available; therefore, annual rates were used for all inventory sources.</p> <p>See comment response AQ31 regarding the GAQM.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			impairment/regional haze which is evaluated on a 24-hour average basis. Thus, this approach does not meet current standards for air quality analyses.		
Vicki Stamper	I-99	AQ38	According to the 2004 Air Report, only sources inside 50 km of the modeling domain were included in the modeling, and the modeling domain only extended 50 km from receptors including those in the Class I areas (page 17 of 2004 Air Report). However, the inventory should have also included major industrial sources located beyond 50 km from the Class I areas if they could have a significant impact the Class I area. At the minimum, a review of existing and proposed new sources should have been performed to determine if additional sources should have been included in the modeling. For example, coal-fired power plants can often have significant impacts on a Class I area even when located 200-300 km away from that area, and several existing coal-fired power plants are located outside the modeling domain in Wyoming, Utah and New Mexico that could have significant ambient impacts on the Class I areas modeled. These and other high emitting facilities should have been evaluated to determine if they should have been included in the inventory sources.	The extension of the modeling domain 50 km beyond the modeled sources was agreed to by the stakeholders as part of the modeling protocol. This "buffer" beyond the modeled sources is generally standard modeling practice. It is done to avoid puffs generated by the model for sources close to the boundary leaving the domain quickly and therefore not having any modeled impact. Also, this NEPA air quality analysis is focused on the proposed action and alternatives, and is not performed to determine potential impacts at a given Class I area from every source regardless of proximity to the project area.	
Vicki Stamper	I-99	AQ39	With respect to reasonably foreseeable sources, several new coal-fired power plants have been proposed in recent years that should have been included in the inventory sources even if farther than 50 km from a Class I area. For example, the state of Utah has recently issued air quality permits for two new coal-fired power plants, the Sevier Power Company plant to be located in Sigurd, Utah and new Unit 3 of the Intermountain Power Plant, located in Millard County, Utah, both of which have been projected to impact some of the Class I areas modeled in southeast	No comment can be made regarding the specific sources mentioned in this comment without more detail about the permits or projects. Some of the sources mentioned are well outside the modeling domain for this project. See comment response AQ38.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Utah. Air permit applications have also been submitted for several other coal-fired power plants including for a new Unit 2 at the Bonanza Power Plant which is located in the Verna1 Field Office Area and for a new Unit 4 at the Hunter Power Plant which is located near the Vernal Field Office area. Air permit applications have also been submitted for sources to be located in northwestern New Mexico and/or on Navajo Nation land (e.g., the proposed Mustang Generating Station, the proposed Desert Rock Energy Facility, and the proposed Cottonwood Energy Center), and these facilities will likely impact the southeast Utah Class I areas modeled as well as the southwest Colorado Class I areas.</p> <p>Further, significant gas development is planned for southwestern Wyoming, southwest Colorado, and northwest New Mexico that will likely impact the nearby Class I areas modeled. Draft or final Resource Management Plans and/or Environmental Impact Statements are available for these planned developments (e.g., the Northern San Juan Basis Coalbed Methane Project, Farmington, NM RMP, Rawlins DRMP, and several other gas development projects in southwest Wyoming), and thus the BLM could and should have included these projected emissions in its reasonably foreseeable development inventory of sources modeled for the cumulative analysis.</p>		
Vicki Stamper	I-99	AQ40	In addition, it is also not clear whether any analyses were done to project the impacts of the Roan Plateau DRMP and other BLM source development along with the Vernal DRMP sources. Although the inventories and modeling report were developed for both the Roan	Roan Plateau RMP sources were included in the analysis of impacts in the Vernal RMPA.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Plateau and Vernal RMPs, it is difficult to determine from the 2004 Air Report whether Roan sources were included in the Vernal air analyses as reasonably foreseeable development. If not, that is another oversight that must be corrected. Clearly, the Roan sources could impact the same area that will be impacted by the Vernal sources and thus, should have been included in the cumulative analysis for the Vernal DRMP.</p>		
Vicki Stamper	I-99	AQ41	<p>No Inventory Was Compiled for Sources Permitted by EPA on the Uintah and Ouray Indian Reservation (Within the Vernal Field Office Area).</p> <p>Although the Uintah and Ouray Indian Reservation comprises much of the land in the Vernal Field Office, there is no indication that any review or determination of permitted sources within the reservation was obtained from the Environmental Protection Agency, Region VIII (i.e., the current permitting authority for such Indian lands). The Utah Division of Air Quality (UDAQ) has no permitting authority for sources considered to be located in "Indian Country" and thus a review of only UDAQ permitted sources very likely resulted in an incomplete emissions inventory that underestimated existing and reasonably foreseeable emission increases in the Vernal Field Office. This is a major oversight.</p>	<p>It is the understanding of BLM NSTC-AQ staff that at the time of modeling analysis, no sources on Uintah/Ouray Indian land qualified to be explicitly included in the modeling. The existing sources would be represented by the background air quality data.</p>	
Vicki Stamper	I-99	AQ42	<p>No Sources From Wyoming Were Included in the Modeling.</p> <p>Although, according to Figure A-I of the 2004 Air Report, the modeling domain reached into Wyoming, no Wyoming sources were inventoried or included in the modeling analyses. Yet, sources in Wyoming are</p>	<p>See comment response AQ38.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			likely impacting (or will be impacting) some of the areas included in the modeling analyses, including the Vernal Field Office area and some of the Class I areas in northern Colorado. Thus, it was a major oversight to not include any sources from Wyoming in the source inventory.		
Vicki Stamper	I-99	AQ43	<p>On pages 19-20 of the 2004 Air Report, adjustments made to the inventory sources are discussed. Apparently, the BLM removed several sources from the inventory based on the distance of those sources to the receptor of maximum modeled concentration for five Class I areas (Arches and Canyonlands National Parks and the Maroon Bells, Mt. Zirkel, and West Elk Wilderness Areas). It is not clear what pollutant concentration was used for this "analysis," although the 2004 Air Report does indicate that particulate emissions were examined. As a result of this "screening" analysis by the BLM, large and/or nearby sources of air pollution were removed from the source inventory. These include, among others, the Hunter and Huntington coal-fired power plants, Sunnyside Cogen, the Ouray compressor stations (located within the Vernal Field Office), and the Moab compressor stations. In addition, no sources in western Colorado that could be impacting the Vernal Field Office area should have been removed from the inventory for the analysis of impacts in the Vernal Field Office area which runs to the border of Colorado. The removal of western Colorado sources without any consideration of impacts on the Vernal Field Office area is nonsensical and very likely resulted in an underestimate of ambient impacts in the Vernal Field Office area.</p> <p>This approach to determine whether a source can be</p>	<p>The 2004 Air Report has been revised to clarify how the analysis was performed.</p> <p>The commenter misunderstands how the adjustments to inventory sources were done. The analysis of source-receptor relationships was done only to select a limited number of inventory sources for further review. This was based on particulate matter results of previous modeling of inventory sources and the five Class I areas that had the highest particulate matter impacts.</p> <p>Those sources selected through this screening process were given further scrutiny to check the information provided to Trinity Consultants. No sources were eliminated based solely on the results of the source-receptor relationship analysis.</p>	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>excluded from a cumulative analysis based on its distance from a particular Class I area is not consistent with other commonly used methods for determining whether a cumulative air quality analysis is necessary, nor does it seem scientifically defensible -especially to examine the impacts due to only one pollutant or only at certain Class I areas. Further, considering the large area and number of sources being modeled, it does not seem appropriate to discount the impact of anyone source based on apparent insignificance when, cumulatively, such sources can have a significant impact on an area. In addition, the 2004 Air Report admits that the inventory of sources likely left out some significant sources, in stating "Based on the results of the focused BLM analysis...it is almost certain that some sources included in the modeling should have been screened out, and that some sources not included in the modeling likely should have been." [Emphasis added.] (page 19 of Air Report). As stated in the definition of "Significantly" in the NEP A regulations at 40 C.F.R. § 1508.27, "significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by...breaking [an action] down into small component parts." The EIS is required to include an analysis of significant environmental consequences, pursuant to 40 C.F.R. §§ 1502.1 and 1502.16, and thus the RMP/EIS must include an adequate analysis of the cumulative impacts on air quality.</p>		
Vicki Stamper	I-99	AQ44	<p>It was also inappropriate to assume, for those sources whose exact location was not known, that no source would locate within 10 km of a Class I area. (Discussed on page 18 of the 2004 Air Report). It appears that such sources would likely be smaller sources that would not be subject to PSD permitting</p>	<p>BLM believes that this assumption is indeed appropriate. Because of various limitations, the exact location for every source could not be determined. Therefore, these sources had to be placed randomly with the appropriate portion of the modeling domain. BLM believes that it is unlikely</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>requirements, as any source subject to PSD permitting requirements would have to do air quality modeling and thus the precise location of the source would be known. Smaller air pollution sources that are not subject to PSD permitting would not be subject to any requirement under Utah or Federal regulation to evaluate impacts on a Class I area and would not have been restricted from locating within 10 km of a Class I area. Thus, no additional more stringent air permitting requirements would apply to such non-PSD sources. Consequently, the locations of all sources should have been determined, rather than try to assume a location for a particular source or to create a 10 km buffer around each Class I area that would prohibit any source development. The approach used in the CALPUFF analysis could have resulted in an underestimate of ambient air impacts at Class I areas.</p>	<p>that few, if any of these sources will actually be located within 10 km of a Federal Class I area or that new sources would be located within that buffer.</p>	
Vicki Stamper	I-99	AQ45	<p>No Particulate Emissions From Increased Traffic on Existing Roads Were Quantified or Modeled.</p> <p>According to the 2004 Air Report, PM-10 and PM-2.5 emissions were quantified and modeled for only new roads. (See, e.g., page 26 of 2004 Air Report). However, there will also be increased vehicular traffic due to oil and gas development on existing roads in the Vernal Field Office area. This increased traffic and resulting increase in particulate emissions should have been quantified and modeled. In addition, the BLM should have also projected and modeled the increase in general traffic (i.e., not just related to oil and gas development) likely to occur as a result of the expanded road network. These issues are especially important for documenting the potential impacts to the PM-10 and PM-2.5 NAAQS and PM-10 Class II increments within the Vernal Field Office region.</p>	<p>The fugitive dust calculations included both resource and access roads.</p> <p>Inclusion of secondary non-project sources of fugitive dust was discussed during the stakeholder/protocol development meetings. It was the general opinion of the group that, due to the uncertainty and difficulty in quantifying these emissions, that they would not be included in the modeling.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Vicki Stamper	I-99	AQ46	<p>The Placement of Air Pollution Sources for the CALPUFF Modeling Assessment Did Not Reflect All Areas Where Gas Development Would Be Allowed Under the Vernal DRMP.</p> <p>Figure A3 of Appendix A of the 2004 Air Report indicates the locations of modeled compressor engines and area sources of emissions. There were no emissions sources located north of Dinosaur National Monument (except for one source located in the extreme northwestern corner of the Vernal Field Office area) yet, for all of the alternatives, gas development in the northeast part of the Vernal Field Office area will be allowed (see Figures 11-14 of the Vernal DRMP/EIS).</p> <p>Further, the placement of the Vernal sources for the modeling analyses appears to have assumed that, for those areas identified in Figures 11-14 of the Vernal DRMP/EIS as being subject to "Timing and Controlled Surface Use," there would be restrictions on well spacing imposed by the BLM to ensure less dense development. However, it is not clear in the Vernal DRMP/EIS that there will be any restrictions limiting the density of well development in these regions (or in any part of the Vernal Field Office area).</p> <p>As a result, the modeling analyses may have under predicted maximum impacts from Vernal sources in some areas, including in the Vernal Field Office area or in nearby Dinosaur National Monument. The location of sources modeled should have more accurately reflected the locations of such sources as will be allowed under the Vernal DRMP.</p>	<p>The portions of the VMA nearest the Dinosaur National Monument are the Manila-Clay Basin and the Tabiona-Ashley Valley. These areas are projected to have very little development (see the Vernal RFD), and this is reflected in the number of modeled sources placed in these areas. The placement of sources in the model does in fact reflect the projected development patterns for the Vernal RMA.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Vicki Stamper	I-99	AQ47	<p>The CALPUFF Modeling Did Not Evaluate Impacts at All Class I Areas that Could Be Affected by the Vernal DRMP.</p> <p>The CALPUFF modeling left out some key Class I areas that could be impacted by the Vernal DRMP and other reasonably foreseeable sources. Specifically, the Vernal modeling left out an analysis of impacts to all Colorado Class I areas, the Bridger Wilderness Area (WY), Fitzpatrick Wilderness Area (WY), and Grand Teton National Park (WY). Not only should these Class I areas been included in the analysis, but the modeling domain should have been enlarged to capture other sources of air pollution that are impacting these parks. Rocky Mountain and Mesa Verde National Parks and the Bridger and Fitzpatrick Wilderness areas are already greatly impacted by NOx and VOC emissions. Thus these nearby Class I areas should not have been left out of the air quality analysis for the Vernal DRMP/EIS. Interestingly, the modeling domain appears to extend out enough such that the Colorado Class I areas mentioned above should have been evaluated, but the CALPUFF modeling analyses failed to examine impacts at these Class I areas. Further, although the CALPUFF modeling domain appears to extend approximately 250 km to the south of the Vernal Field Office area, it only extends approximately 100 km to the north of the Vernal Field Office area. No reasons for these discrepancies are provided in the DRMP/EIS or the 2004 Air Report.</p>	<p>The modeling domain and the Class I areas included in the analysis were considered and approved by the stakeholders group, which included the FLMs (USFS, NPS) that have management responsibility for the Class I areas under consideration.</p> <p>See comment response AQ38.</p>	
Vicki Stamper	I-99	AQ48	<p>The DRMP/EIS Did Not Provide a Cumulative Assessment of Impacts to Visibility or Other Air Quality Related Values in Affected Class I Areas.</p>	<p>The BLM believes that the cumulative analysis presented in Draft RMP/EIS is adequate to meet NEPA requirements. The Air Quality Related Values (AQRV) (visibility, acid deposition, ANC) does use appropriate background values for each of</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Although the 2004 Air Report and the DRMP/EIS present results of "cumulative" visibility and other air quality related values (AQRV) impacts in affected Class I areas, the analysis does not truly represent a cumulative analysis of impacts. The AQRV analysis differs from the NAAQS analysis, in which the BLM assumed (improperly, as discussed in detail above) that a background concentration reflected the impacts of all sources in existence prior to the "monitoring baseline date." However, the AQRV analyses for the Vernal RMP do not use a similar approach, and no information was provided on the existing visibility impairment or the existing levels of nitrogen and sulfur deposition for any of the Class I areas modeled. The DRMP/EIS should have included a comprehensive cumulative assessment of impacts to AQRVs at affected Class I areas so it can be determined whether the Vernal DRMP sources will cause or contribute to significant adverse impacts on any AQRVs at affected Class I areas. At the minimum, the DRMP/EIS must make clear that no cumulative assessment of impacts to AQRVs was conducted for the Vernal DRMP</p>	<p>the analyses. See the details of each analysis in the TSD.</p>	
Vicki Stamper	I-99	AQ49	<p>The Visibility Analysis Relied on an Incorrect Standard for Defining Significant Visibility Degradation.</p> <p>In the visibility analysis for Class I areas (also performed for some Class II areas), the BLM relied on a 1.0 deciview (dv) change as defining whether the Vernal DRMP would result in significant visibility impacts in mandatory Class I areas. However, all of the Federal Land Managers (i.e., those agencies with an affirmative responsibility under the Clean Air Act for protecting the air quality related values of mandatory Class I areas) consider a 0.5 dv change to be a Limit of Acceptable Change threshold. (The DRMP/EIS</p>	<p>BLM, as one of the FLMs, uses the number of days in excess of a 1.0 deciview "Just Noticeable Change" potential visibility change as a significance threshold for its NEPA analyses.</p> <p>This is based on the following statement by Pitchford and Malm in their 1994 Atmospheric Environment article titled "Development and Application of a Standard Visual Index" (Vol. 28, No. 5, pp 1049-1054): "Ideally, a JNC [Just Noticeable Change] change in a scene resulting from a change in the extinction coefficient should be about a 1 or 2</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>misstates the Federal Land Manager's Air Quality Related Values Workgroup Phase I Report, December 2000 {FLAG guidance) as applying a 0.5 dv change as a limit of acceptable change only for single sources, and a 1.0 dv change to cumulative impact analyses.)</p>	<p>dv [deciview] change in the deciview scale (i.e. a 0.1 - 0.2 fractional change in extinction coefficient) regardless of the baseline visibility level." By using the 1.0 dv threshold, BLM has chosen to report potential significance based on the lowest value of Pitchford and Malm's range of "Just Noticeable Change."</p> <p>Although it is possible that certain specific views (with certain specific air pollutants, meteorological conditions and sun angles) could present a "Just Noticeable Change" at levels below 1.0 dv, The BLM is not aware of any scientific publications or regulatory requirements which indicate 0.5 dv is a "Just Noticeable Change." EPA's Final Regional Haze Regulations (64 FR 126, July 1, 1999) support the use of 1.0 dv as the significance level when conducting periodic 5 and 10 year reasonable progress reports towards meeting the national visibility goal of no man-made impairment within mandatory federal PSD Class I areas by 2064.</p> <p>The only place that BLM is aware of the 0.5 dv being used as a threshold is in the December 2000 FLAG Phase I Report (Figure V-1) which describes for a single source permit review, if the single source contribution to change in extinction is not => 5.0 per cent [equivalent to 0.5 dv], then the FLM [USDA-FS, USDI-NPS, or USDI-F&WS] is not likely to object to the permit.</p> <p>The December 2000 FLAG Phase I Report (Figure V-1) also states that for a cumulative visibility impact</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>analysis of PSD increment consuming sources, if no single source contributes => 0.4 per cent change in extinction [equivalent to 0.04 dv] nor the cumulative sources contribute => 10 per cent change in extinction [equivalent to 1.0 dv], then the FLM [USDA-FS, USDI-NPS, or USDI-F&WS] is not likely to object to the permit.</p> <p>There is simply no basis for interpreting 0.5 dv as a "Just Noticeable Change" for cumulative NEPA potential visibility impact assessments.</p>	
Vicki Stamper	I-99	AQ50	<p>The Class I Visibility Analysis for the DEIS Does Not Comport with Federal Land Managers' Guidance for Such Analyses.</p> <p>The Class I area visibility analysis conducted for the DRMP/EIS deviates from the commonly followed FLAG guidance of the Federal Land Managers (FLMs). Specifically, the visibility modeling did not consider any hours with relative humidity greater than 90%. Although the reasons for this are not stated in the 2004 Air Report, this approach has been proposed in some recent air quality permit applications based on the claim that the IMPROVE visibility monitoring data Standard Operating Procedures ignore those data. However, the IMPROVE Standard Operating Procedures do not indicate that any hours over 90% relative humidity are "invalid." Instead, when the relative humidity measured at the transmissometer receiver is greater than 90%, the transmissometer data is flagged as having a "possible interference" due to meteorological interferences. (See page 23 of "Transmissometer Data Reduction and Validation (IMPROVE Protocol), Number 4400-5000, Revision</p>	<p>The National Park Service, U.S. Fish & Wildlife Service, and USDA-Forest Service formed their "Federal Land Managers' AQRV Work Group" (FLAG) "to achieve greater consistency in the procedures Federal Land Managers use in identifying and evaluating AQRVs (air quality related values)." Although BLM also administers mandatory federal PSD Class I areas, BLM were not invited to be one of the FLAG agencies. FLAG's fundamental principle is that new air pollutant emission sources "(PSD and those subject to new source review) should not, by themselves, significantly impede progress toward the national visibility goal."</p> <p>In their December 2000 final FLAG Phase I report, FLAG identified a process to analyze potential AQRV (including visibility) impacts when conducting New Source Review. Their referenced legal basis for the visibility impact analysis process was stated as: "The FLMs have visibility protection responsibility under 40 CFR §51.307 (New source review), which spells out the requirements for State Implementation Plan (SIP) visibility protection</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>1.0, Mar 1995, available at http://vista.cira.colostate.edu/improve/Publications/SOPs/arssop.asp.</p> <p>It is important to note that, in high humidity conditions, nitrate and sulfate particles attract water molecules, making the particles very efficient in scattering light and causing decreased visibility conditions. If precipitation were occurring, then of course many of those particles would be "scrubbed" from the air, but under the FLAG guidance humidity is capped at 98% to represent such conditions. Thus, the result of the BLM's approach of not using relative humidity data over 90% means that visibility impacts were underestimated not using relative humidity data over 90% means that visibility impacts were underestimated. Not using relative humidity data over 90% means that visibility impacts were underestimated.</p> <p>As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone. As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale</p>	<p>programs, as well as 40 CFR §52.27 (Protection of visibility from sources in attainment areas) and 40 CFR §52.28 (Protection of visibility from sources in non-attainment areas). These three provisions, taken together along with the SIP-approved rules, establish the visibility protection program for new and modified sources throughout the country."</p> <p>Appendix 2.A (Visibility Parameters) states:</p> <p>"FLAG proposes that the relative humidity adjustment to the "dry" scattering efficiencies (unadjusted for relative humidity) for hygroscopic particles are made as follow: ...The preferred alternative is to apply day-by-day f(RH) adjustment factors to the analysis. For this alternative hourly relative humidity data are needed. Hourly f (RH) values should be averaged to generate a 24-hour relevant f (RH) factor. FLAG recommends, however, that if the hourly relative humidity exceeds 98%, that it be rolled back to 98%, so that there will be no f (RH) factors applied that are greater than f (98)."</p> <p>Furthermore, Table 2.A-1 states:</p> <p>"f(RH) values for various values of relative humidity" (un-referenced) assumes dry ammonium nitrate and ammonium sulfate light scattering efficiencies are to be multiplied by the following factors at the specified relative humidity's:</p> <p>1x (no multiplier) up to 36 percent RH; 2x (doubled)</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone.</p> <p>As discussed above, based on the FLMs' 0.5 dv Limit of Acceptable Change threshold, the BLM sources alone would have a significant impact on visibility in two Class I areas. With the necessary adjustments to the emissions inventory and the modeling of two additional years of mesoscale meteorology data, in addition to properly considering the relative humidity data, the visibility modeling results would likely show even greater visibility impacts as a result of BLM sources alone.</p>	<p>at 71 percent RH; 3x (trebled) at 82 percent RH; 4x (quadrupled) at 88 percent RH; factor of 4.3x at 90 percent RH; factor of 5.3x at 91 percent RH; factor of 5.9x at 92 percent RH; factor of 7.0x at 93 percent RH; factor of 8.4x at 94 percent RH; factor of 9.8x at 95 percent RH; factor of 12.4x at 96 percent RH; factor of 15.1x at 97 percent RH; and a factor of 18.1x at 98 percent RH. FLAG "clamps" the light scattering growth factor at 18.1x for relative humidity values of 99 and 100 percent without any explanation.</p> <p>The growth factors were derived by Tang's ammonium sulfate growth curves smoothed between the crystallization and deliquescence points [Tang I.N., Wong W. T. and Munkelwitz H. R. (1981). The relative importance of atmospheric sulfates and nitrates in visibility reduction. Atmospheric Environment 15, 2463] which clearly show a dramatic exponential assumed light scattering efficiencies above 90 percent RH. In fact, a 99 percent RH corresponds to a growth factor of nearly 50x, and 100 percent RH would be over 4,000,000x</p> <p>When BLM models potential visibility impacts from a proposed action (and alternatives) under NEPA using daily optically measured extinction, we will not use data observed at ambient conditions above 90 percent RH because the IMPROVE Standard Operating Procedures indicate those data are not valid (The conclusion of invalidity is easily drawn from their discussion and selection of data). We will assume either modeled or observed aerosols can</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>increase their "dry" light scattering efficiencies by 4.3x at ambient conditions at or above 90 percent RH as a reasonable assumption.</p> <p>However, it is unreasonable to assume (throughout the semi-arid continental climate regimes of the West) that the visibility impact analysis procedures described by FLAG, and the just noticeable change parameter of 1.0 deciview developed by Pitchford and Malm (1993), are valid under ambient conditions at or above 90 percent RH for an entire 24-hour day. Aerosol data collected under ambient conditions at or above 90 percent RH for 24-hours are likely to be minimized due to precipitation "scrubbing," and the potential impact of modeled aerosols would be overestimated using light scattering efficiencies greater than 4.3x.</p> <p>Although BLM accepts these compounding biases as "reasonable" up to 90 percent RH, we will not further exaggerate these biases by using light scattering efficiencies up to 18.1x, as suggested by the commenter.</p>	
Vicki Stamper	I-99	AQ51	<p>The cumulative visibility analysis, considering BLM sources and the inventory sources (which began operating or increased emissions since the "monitoring baseline date"), indicated that the BLM sources would contribute to adverse visibility impacts at Arches National Park. However, in the 2004 Air Report, a method was used to "refine" the analysis that is inconsistent with current policy and not scientifically credible. However, the DRMP/EIS does not provide any information on the refinements. The cumulative visibility modeling analyses results are provided on</p>	<p>Refined visibility analyses, using results from the same CALPUFF modeling used in the screening analysis, were performed. More details of the refined visibility are discussed in comment response AQ52.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			page 4-27 of the DRMP/EIS, and the discussion on page 4-28 of the DRMP/EIS indicates that no refined modeling analysis was done. This conflicts with the information in the 2004 Air Report.		
Vicki Stamper	I-99	AQ52	<p>Specifically, the daily "refined" analysis of the 2004 Air Report considered hourly IMPROVE optical monitoring data measured at Canyonlands National Park from 1987- 2001. Neither the DRMP/EIS nor the 2004 Air Report provide further details on how the Canyonlands National Park data were used to refine the visibility analysis. My guess is that the Canyonlands data may have been used to alter what was considered as natural background conditions in the CALPUFF modeling. Changes in visibility are to be determined based on natural visibility conditions. Visibility conditions that existed during 1987-2001 in Canyonlands National Park were clearly being impacted by manmade sources and did not reflect natural conditions. As defined in federal regulations, visibility impairment means "any humanly perceptible change in visibility ...from that which would have existed under natural conditions." [Emphasis added.] (40 C.F.R. §51.301).</p> <p>While there has been some use of on the ground transmissometer data in a few recent air permit applications for new coal-fired power plants, its use was to attempt to indicate if weather could be shown as the cause of modeled adverse visibility impacts (by comparing the modeled days of high impact to those same days of on the ground transmissometer data). To my knowledge, the Federal Land Manager air quality experts have not accepted this approach to discounting visibility impacts. In large part, this is</p>	<p>The refined visibility calculations where done :</p> <ol style="list-style-type: none"> 1. The concentrations of coarse PM, soil PM, sulfate ion, and nitrate ion, are calculated from the CALPUFF modeled daily f (RH) and extinctions for PM coarse, PM fine, sulfate and nitrate. 2. The concentrations are then used to calculate delta dv using the standard equation, using an average daily background extinction and average daily f (RH). The values for extinction) are taken from the Canyonlands IMPROVE site. F (RH) values were taken from CALPUFF model output. <p>As stated above in response to previous comments, FLAG Guidance is just that, guidance, not regulation. BLM uses FLAG methodology when we believe it is appropriate and scientifically defensible. However, BLM NSTC staff use other methods when we believe other methods will yield a more defensible result.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>because the transmissometer data is flagged conservatively, and the flags are not accurate indications of weather interference. It does not appear that the BLM used this approach, since the BLM evaluated many other years of transmissometer data than just the modeled 1996 meteorological data year. However, as stated above, it is not clear exactly how the transmissometer data was used to refine the cumulative visibility analysis for the Vernal DRMP because it is not specifically discussed in the Air Report or in the DRMP/EIS. In any case, the Federal Land Managers' modeling guidance does not provide for refinement of modeled visibility impacts based on transmissometer data. Thus, the BLM's "refined" visibility assessment approach does not comport with currently accepted practices for such analyses.</p> <p>In summary, the BLM should not have used its "refined" visibility analysis to discount its initial modeling assessment. Instead, the Vernal DRMP/EIS should have clearly indicated that the BLM sources under the Vernal DRMP could contribute to significant impacts on visibility in Arches National Park. Further, as discussed above, the visibility modeling analysis should be redone to include a proper and complete emissions inventory (for sources expected in the Vernal Field Office area, inventory sources, and other reasonably foreseeable development in the region), use 3 years of mesoscale meteorological data, properly consider the relative humidity data, and assess impacts at other Class I areas besides just those in southern Utah that could be impacted by the Vernal Field Office sources. Only after such a complete and thorough visibility modeling analysis will it be known if the Vernal DRMP sources could cause or contribute to significant</p>		

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			adverse impacts on visibility in nearby Class I areas.		
Vicki Stamper	I-99	AQ53	<p>The DRMP/EIS Relied on Incorrect Sulfur and Nitrogen Deposition Thresholds for National Park Service Class I Areas.</p> <p>The 2004 Air Report relied on USDA-Forest Service sulfur and nitrogen deposition threshold values from 1989 of 3 kilograms per hectare per year (kg/ha/yr) for sulfur and 5 kg/ha/yr for nitrogen when evaluating whether the sulfur and nitrogen deposition were significant. However, the National Park Service and the Fish and Wildlife Service use an entirely different and more stringent set of thresholds of concern for sulfur and nitrogen deposition. Specifically, in 2001 and 2003, these two agencies developed deposition analysis thresholds for nitrogen and sulfur deposition in NPS and FWS Class I areas (available at http://www2.nature.nps.gov/air/Permits/flag/FlagInfo/N%20&%20S%20DAT%20Guidance.doc). The deposition analysis thresholds or "DATs" represent the level at which the deposition impacts are considered to be significant. In the West, the DATs are 0.005 kg/ha/yr for both sulfur and nitrogen deposition.</p> <p>With the revisions necessary to the emissions inventory and the modeling of additional years of meteorological data and at additional nearby Class I areas as discussed above, the sulfur and nitrogen deposition predicted for Verna1 Field Office sources may cause or contribute to exceedances of these thresholds. Until a proper analysis is completed, it is not clear whether the Verna1 Field Office sources in conjunction with other reasonably foreseeable development will have</p>	<p>The USDA-Forest Service (Fox, et al 1989) has identified the following total deposition (wet plus dry) thresholds below which no adverse impacts are likely: five kg/ha-yr for sulfur, and three kg/ha-yr for nitrogen." (See Fox et al, 1989) - these values actually vary by region of the US).</p> <p>The FLAG "Deposition Analysis Thresholds" (used as guidance when reviewing PSD Permit Applications) are based on a "natural background deposition value" (0.50 kg/ha-yr N or S "East" and 0.25 kg/ha-yr N or S "West"), adjusted by a "Variability Factor" (0.50, or cutting natural background in half) and a "Cumulative Factor" (0.04, assuming the cumulative source impact would be 25 times greater than the modeled deposition impacts).</p> <p>Whereas Fox identifies potential adverse impacts, FLAG is simply a screening process to eliminate those sources that are certain not to have a significant impact, so that no further analysis is required by the FS, FWS or NPS. Therefore, BLM did not use the FS DATs in this analysis.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			significant impacts on sulfur or nitrogen deposition at nearby Class I areas.		
Vicki Stamper	I-99	AQ54	<p>The DRMP/EIS Failed to Include an Analysis of VOC Emissions or its Impacts on Ozone Concentrations.</p> <p>The DRMP/EIS did not provide any assessment of volatile organic compound (VOC) emissions from the planned and reasonably foreseeable oil and gas development, or from flaring operations. Further, the DRMP/EIS did not include any analysis of impacts from air emissions sources of VOCs and NOx on ground level ozone concentrations. According to the 2004 Air Report, no ozone analysis was done because of the "relatively insignificant" levels of VOC emissions.</p> <p>Recent studies have indicated that the amount of light alkane hydrocarbons and methane from oil and gas development can be quite significant (and are often underestimated), which can create optimal conditions for ozone formation. In fact, air monitoring performed across Texas, Oklahoma, New Mexico, Missouri, Arkansas and Kansas in 2001 and 2002 found high levels of hydrocarbons including methane, ethane, propane, and butane, as well as alkyl nitrates which are a byproduct of the reactions that form ozone. See Smog Underestimated in Southwestern US. at http://www.pnas.org/misc/archive100603.html#HL1. See also "Extensive regional atmospheric hydrocarbon pollution in the southwestern United States" by Aaron S. Katzenstein, Lambert A. Doezema, Isobel J. Simpson, Donald R. Blake, and F. Sherwood Rowland, available at the URL listed above.</p>	<p>VOC (HAPs) emissions from compressors and dehydrators were included in the modeling.</p> <p>The CALPUFF model, approved by the stakeholder group, cannot be used to predict potential future ozone concentrations.</p> <p>BLM is cooperating with IPAMS on the Uinta Basin Air Quality, which will model potential ozone impacts from oil and gas development in the basin as well as surrounding BLM Field Offices. Also, the air quality analysis for the White River RMP Amendment & Oil and Gas EIS will model ozone impacts in the region.</p> <p>BLM would welcome a cooperative, multi-agency ozone modeling exercise focused on oil and gas development in the Western U.S.</p> <p>EPA Region VIII, in their comments on the Roan Plateau RMP DEIS, said "Running a regulatory ozone model such as RPM-IV for purposes of the DEIS is impractical, and we understand that BLM's National Science & Technology Center (now National Operations Center) may be reluctant to estimate potential ozone impacts with a conservative method such as VOC/NOx point source screening tables."</p> <p>This topic will be discussed further in a future meeting with the State of Utah and the Utah DEQ.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Although elevated ozone levels are often thought of as associated only with major metropolitan areas, recent monitoring data shows that rural areas to the north, east, and south of the Vernal Field Office area are experiencing elevated concentrations of ozone. For example, Rocky Mountain National Park in Colorado is experiencing ozone concentrations in excess of the ozone NAAQS. Southwest Colorado/northwestern New Mexico has also been experiencing elevated levels of ozone concentrations very close to the level of the NAAQS. The Green River Basin in southwestern Wyoming monitored concentrations that were 94% of the ozone NAAQS in 2001 (the monitor is no longer operating). Further, information provided by the state of Utah shows that the 8-hour average ozone concentration in nearby Canyonlands National Park for 2001-2003 was 0.074 ppm- almost 93% of the ozone NAAQS. Thus, ozone concentrations should be a concern for the Vernal DRMP, and yet estimates of increases in ozone precursor emissions (VOCs and NOx) and potential impacts on ozone concentrations were ignored in the Vernal DRMP/EIS and the 2004 Air Report.</p> <p>Considering the recent studies on the ozone potential of oil and gas development emissions, the elevated ozone concentrations in areas that could be affected by the Vernal DRMP ,as well as the health and environmental impacts that can occur due to elevated ozone concentrations, the DRMP/EIS should have evaluated the environmental impacts that could occur due to ozone formation from the DRMP sources and all existing and reasonably foreseeable growth in contributing VOC and NOx emissions to the region. At the very minimum, the DRMP/EIS should have</p>		

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			included an estimate of potential VOC emissions that could occur as a result of the Vernal DRMP and other reasonably foreseeable sources based on the latest studies of the amount of VOCs that can be emitted from oil and gas development.		
Vicki Stamper	I-99	AQ55	Because of the flaws in the near-field analysis with respect to the number of wells and other associated air pollution sources modeled and no consideration of local topography, the estimated concentrations of hazardous air pollutants were likely underestimated in the BLM's analysis. Further, there was no evaluation of the potential hazardous air pollutant emissions that could be emitted from flaring operations. With the recommended changes to the near-field analysis, the hazardous air pollutant concentrations would likely be greater.	See comment responses AQ8, AQ9 and AQ12) on the near-field modeling analysis.	
Vicki Stamper	I-99	AQ56	Even with the BLM's analysis, the results showed that the benzene, formaldehyde, and xylene concentrations exceeded the range of acceptable air concentration limits (AACLs).	While this is true, it should be noted that the incremental risk associated with these potential modeled concentrations (benzene, formaldehyde; xylenes are not considered carcinogenic) are well with the EPA generally acceptable risk range of 1x10 ⁻⁴ to 1x10 ⁻⁶ (EPA, 2003)	
Vicki Stamper	I-99	AQ57	Similarly, due to the flaws in the inventory for the CALPUFF analysis (including insufficient number of compressor engines and failure to space wells more in line with where the BLM has projected the development to occur), the hazardous air pollutant analysis in the CALPUFF assessment also likely underestimated overall ambient impacts.	See comment responses AQ28, AQ29, AQ34, and AQ37-44 on the far-field (CALPUFF) modeling analysis.	
Vicki Stamper	I-99	AQ58	The DRMP/EIS Failed to Analyze Mitigation Measures for the Predicted Air Impacts. Although the BLM's air quality analyses predicted significant air quality impacts to visibility in Arches	The "predicted significant air quality impacts to visibility in Arches National Park" is one day with visibility impacts greater than 1.0 deciview in the screening analysis. The refined analysis showed no such impacts.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>National Park as well as for concentrations of benzene, formaldehyde, and xylene, the DRMP/EIS did not include evaluate potential mitigation measures. Pages 4-25 to 4-26 of the DRMP/EIS discuss potential mitigation measures for prescribed burning and for fugitive dust from mineral extraction. However, no mitigations for air emissions sources due to gas development (e.g., compressor stations) were discussed. Instead, the BLM indicated that other agencies' air permitting regulations would require cumulative analyses and would ensure no adverse impacts. However, as discussed above, many of these air pollution sources would be under EP A's jurisdiction if located in "Indian Country." Most of these sources will be considered minor sources and won't be subject to any permitting requirements if located in Indian Country .If such sources located on lands under the jurisdiction of UDAQ, then an air quality permit will likely be required, but it is not clear under Utah air quality regulations that a cumulative air quality analysis would be conducted (or that UDAQ would have any authority to deny a permit if a new minor source would contribute, but not cause, an adverse impact on air quality). Further, UDAQ's permitting regulations would not require an evaluation of impacts on visibility or other air quality related values or a cumulative PSD increment analysis for a minor source.</p> <p>If the flaws in the BLM analyses that are discussed above were addressed, the air quality impacts as a result of the Vernal DRMP and other reasonably foreseeable development would likely be worse and potentially more extensive. Thus, subsequent to a complete and proper air analysis, the DRMP must include a discussion and evaluation of mitigation</p>	<p>See comment response AQ56 regarding air toxics.</p> <p>Based on the above, namely that no significant air quality impacts were modeled, there is no need to discuss mitigation.</p> <p>A cumulative analysis was conducted as part of larger air quality study.</p> <p>Conjecture regarding what the results of a significantly changed (which BLM believes unnecessary) air quality analysis are improper and irrelevant, as would acting on such conjecture.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>measures to avoid or minimize these impacts. As stated in 40 C.F.R. § 1508.20, mitigation includes, among other things, avoiding the impact altogether by not taking a certain action or parts of an action, minimizing impacts by limiting the magnitude of an action, and reducing or eliminating the impact over the life of the action. The DEIS must include a discussion of all mitigation options. Such a discussion is necessary to ensure that public officials have all of the information necessary to ensure that air quality is protected to the greatest extent possible.</p>		
Vicki Stamper	I-99	AQ59	<p>Based solely on the EPA standards and models for human health and visibility, The Air Quality analysis does not consider potential impacts to fish and wildlife resources, nor does it present data in a format meaningful to natural resources. In, general, the standards for deposition (particulates, SO₂, and NO₂) are based on annual averages, not on actual total deposition, which is more important to plant and aquatic communities.</p>	<p>The dispersion models used in the air quality analyses are the generally accepted methods available to predict potential air quality impacts for a NEPA-related analysis. Air Quality standards for criteria pollutants are set by the EPA and must be used to judge potential impacts.</p> <p>There are no standards for deposition provided by EPA, so the BLM uses the USDA-Forest Service (Fox, et al 1989) total deposition (wet plus dry) thresholds below which no adverse impacts are likely: five kg/ha-yr for sulfur, and three kg/ha-yr for nitrogen. See comment response AQ53 for more information.</p>	
Vicki Stamper	I-99	AQ60	<p>Of special interest in the naturally nitrogen-limited environment in the Western United States are deposition totals for nitrogen (N). In a recent Bioscience article (2003), Fenn, et. al. noted several ecological effects from N deposition in the West. Some of the documented effects at various sites include: N enrichment and shifts in diatom communities in alpine lakes; increased NO₃- concentrations high-elevation lakes; N enrichment of soil and plants; decreased</p>	<p>The workgroup report appears to be a worthwhile effort, but until air managers have “interpreted data, published data, and standardized thresholds or limits of acceptable change,” little can be done in applying these to on-going NEPA analyses.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>diversity of mycorrhizal communities; alpine plant community changes; enhanced growth of invasive species; lichen community changes; and an altered fire cycle. Other studies have noted that chronic nitrogen enrichment can alter the diversity and mutualistic function of mycorrhizal fungal communities, which may influence plant communities (Egerton-Warbuton, et. al., 2001), and that N deposition can suppress plant diversity, forb production, and forb abundance (Zavaleta, et. al., 2003). As response to concerns, researchers from the BLM, Forest Service, National Park Service, and various institutions of higher education produced a report with methods for monitoring lichens for air quality indicators (USDA Report, 2002)</p>		
Vicki Stamper	I-99	AQ61	<p>In general ecological terms, you should provide information about deposition to the VPA from BLM-permitted activities, particularly resources.</p>	<p>This information was provided for nitrate and sulfate deposition.</p>	
Vicki Stamper	I-99	AQ62	<p>Also, since the VPA contains several listed and candidate species, it is important to acquire knowledge about the potential impacts of, at a minimum, N deposition, and it is important to minimize deposition. We recognize that the modeling for this RMP was both inexact and expensive, and do not recommend repeating it. We also recognize that the time frame for ecological change can be long. However we do recommend the following:</p> <p>Partner with the Ashley National Forest to continue and expand lichen/air quality research conducted by Professor Larry St. Clair of BYU on FS sites and add to it BLM-managed lands. The partnership should include the Dinosaur National Monument (Monument). This will allow you to use existing baseline data gathered at the Monument by Prof. St. Clair and will more</p>	<p>The BLM thanks the USFWS for the recommendations.</p> <p>BLM would welcome the USFWS to set up meetings with BLM State, Field Office, or NSTC personnel to discuss this issue further.</p> <p>The BLM does not believe it would be appropriate to require operators to join a voluntary program. Several operators within the area administered by the Vernal FO are already enrolled in the program.</p> <p>So called "green completions" (flareless) are becoming common practice in many areas.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>accurately quantify air quality impacts to the Monument's natural resources.</p> <p>Require, as a condition of approval, oil and gas operators to partner with the EPA Gas STAR program to minimize emissions from natural gas production, transmission, and distribution.</p> <p>Develop and implement alternatives to natural gas flaring</p>		
Vicki Stamper	I-99	AQ8	The BLM performed the near-field modeling in flat terrain (Page 4-12 of DRMP/EIS). Yet, the BLM admits that complex terrain "exists over much of the project area." (Page 4-17 of the DRMP/EIS). The modeling analysis would likely show higher ambient concentrations if the terrain of the area was taken into account, for example due to emission plumes impacting elevated terrain above a source or due to trapping of air pollutants. Thus the BLM should have attempted to estimate the locations of air pollutant sources using the topography of the Vernal Field Office area and the expected areas of gas development.	Flat terrain was chosen because the level of information available for the location of sources was insufficient to do otherwise. Further, modeled results in complex terrain would not necessarily result in higher concentrations. This would depend on several factors including: location of sources relative to the terrain; shape, height, and location of terrain; meteorology, source characteristics, etc.	
Vicki Stamper	I-99	AQ9	The BLM could have considered the complex terrain of the area by evaluating areas where high gas development is likely to occur and by making an educated guess, based on local meteorology and topography, as to the location that might show worst case (or close to worst case) ambient impacts.	NEPA no longer requires a "worst-case" analysis. Thus, this type of analysis was not done. (See Federal Register: April 25, 1986 (Volume 50, Number 80), Rules and Regulations, Pages 15618-15626)	
Steve Chapel	I-101	RE28 (RE-H)	There needs to be ATV trail designations where full size vehicles are not allowed.	Comment noted.	
Steve Chapel	I-101	RE29 (RE-I)	Rather than making dead end routes-make loops by using trail dozer for new construction. In many cases, it is a very short distance.	Comment noted.	
Steve Chapel	I-101	RE30	WSAs should be treated as multiple use and motorized use should be allowed on existing routes and new trail	The BLM must comply with the Wilderness Act. The Act says that wilderness is a place where nature is	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
		(RE-J)	construction should be allowed.	<p>untrammelled by humans and where people are themselves only visitors. It further defines prohibition of certain uses as follows:</p> <p>“Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.”</p> <p>(The Wilderness Act of 1964, Public Law 88-577, 88th Congress, S. 4 September 3, 1964, Section 4 [c]).</p>	
Robert Kessler	I-102	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Bertha Ward	I-103	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Bertha Ward	I-103	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Bertha Ward	I-103	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
Richard Wilson	I-104	AT12 (AT-D)	The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.	FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources. See comment response AT58.	
Richard Wilson	I-104	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Richard Wilson	I-104	AT14 (AT-F)	The Greater Dinosaur/Book Cliffs Heritage Plan preserves opportunities for camping, river running, fishing, hunting, hiking, wild life viewing, and other traditional activities on these lands without the disruptive sights and sounds of vehicles or industrial development. This plan has the backing of scientists, environmentalists and local citizens and should be given greater consideration.	See comment response AT1.	
John Scott	I-105	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow or oil and gas leasing in areas with wilderness	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Lydia Garvey	I-106	AT12 (AT-D)	<p>The BLM's preferred alternative should be balanced in order to provide for a full spectrum of resource uses and recreational opportunities on our public lands. Instead, the agency's preferred alternative for Vernal</p>	<p>FLPMA directs the BLM to manage public lands on the basis of multiple use (Section 102(a) (7)). As a multiple-use agency, the BLM is required to implement laws, regulations and policies for many</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>opens 93 percent of the area to industrial development and designates a spaghetti network of motorized routes, foreclosing certain resource management options for these scenic and wildlife rich lands. In no way is this balanced.</p>	<p>different and often-competing land uses and to resolve conflicts and prescribe land uses through its land use plans. The BLM must manage lands under its jurisdiction to the benefit of the public and permit valid land uses where such uses do not result in unmitigated damage to resources.</p> <p>See comment response AT58.</p>	
Lydia Garvey	I-106	AT13 (AT-E)	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Betsy Shade	I-107	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Betsy Shade	I-107	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Nick Theos	I-108	LG64 (LG-M)	Mining, drilling for oil or gas: Road or pipeline construction should not be done when grazing is going on. Conflicts with drilling, mining, vehicles, road and pipeline construction and the wildlife force the wildlife into more virgin areas and possible reduction in the permittee's AUM's, numbers, and/or time. Drilling pads, pipelines, and roads must be reseeded and weed spraying must be required, and lost AUM's be re-instated. Users should communicate directly as well as through the Range Con.	Comment noted.	
Nick Theos	I-108	LG65	Since the permittees were not included in the drafting of this document I feel it necessary and I am willing to go out on the range with knowledgeable people to assess and monitor the area before any of the alternatives are decided on.	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Nick Theos	I-108	LG99 (LG-K)	I believe in multiple use, but shouldn't every use be controlled? Why is it always livestock? Use on BLM lands has increased and every use should be treated alike. Over use by any entity works a decrease on another.	The BLM has considered a full range of management options in the development of the alternatives under consideration in the RMP. The BLM recognizes that livestock grazing is a primary use of public lands designated as chiefly valuable for that purpose and has accommodated the continuance of grazing within the parameters of federal law and BLM policy. Please, see responses to Comments LG4, LG20, LG60, and LG75 for additional information about the laws and policies governing BLM's authority to manage grazing on lands under its jurisdiction.	
Nick Theos	I-108	LG100 (LG-L)	OHV use is here, but needs to be curtailed to some extent during the periods when livestock are grazing an area especially during lambing or calving.	Restriction of OHV travel to designated routes and areas as proposed under Alternatives A, B, C, and E (see Table 2.1.15 Travel –Travel Roads and Trails) in the PRMP/FEIS is expected to reduce OHV-livestock conflicts.	
George Huntzinger	I-109	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Morris Jenkins	I-110	AT21 (AT-M)	I vote for Alternative D.	Comment noted.	
J.C. Brewer	I-111	SD214 (SD-II)	43 CFR 1610.7-2 requires potential ACECs to meet test of relevance and importance. Bitter Creek does not meet either requirement. Nothing in this area is so significant or distinctive that it requires an ACEC designation to prevent irreparable damage to important resources. Alternatives A and C do not meet the requirements of the regulation that creates ACECs and should not be considered further.	See Response to Comment SD27-G-22.	
J.C. Brewer	I-111	SD215 (SD-JJ)	Black-footed ferrets were introduced in Coyote Basin under 10-J status and do not require special protections. The population of prairie dogs is not being threatened by current activities. All other values listed	Section 3.14.2.1 in the PRMP/FEIS has been revised to clarify 10j status of black-footed ferrets in Coyote Basin.	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			under Alternative A, B or C can be achieved by other means. This proposed ACEC does not meet the test of Relevance under 43 CFR 1610.7-2. Drop from further consideration.	See Appendix G for additional information on the relevance and importance of this proposed ACEC.	
J.C. Brewer	I-111	SD216 (SD-KK)	Select Alternative A. Alternative C does not meet the requirement of 43 CFR 1610.7-2 for relevance and importance. Resource values purposed for protection can be protected by other means other than ACEC designation.	See Response to Comment SD8-G-9.	
J.C. Brewer	I-111	SD217 (SD-LL)	Select Alt B. Do not designate as an ACEC. It may meet the Relevance test, but not importance.	See Response to Comment SD8-G-9.	
J.C. Brewer	I-111	SD218 (SD-MM)	Select Alternative B. Do not designate as an ACEC; manage as an SRMA. The area may meet the Relevance test, but not importance.	See Response to Comment SD8-G-9.	
J.C. Brewer	I-111	SD219 (SD-NN)	Select Alternative B.	See Response to Comment SD8-G-9.	
J.C. Brewer	I-111	SD220 (SD-OO)	Select Alternative A. This ACEC may meet requirements of Relevance and Importance because damage or destruction of scenic values would be irreparable. Create activity plan now and make it a part of the RMP.	See Response to Comment SD8-G-9.	
J.C. Brewer	I-111	SD221 (SD-PP)	Select Alternative A. Main Canyon is not significantly different from the rest of the Book Cliffs area does not contain values that meet the test of importance. None of the values listed under "Relevance" would be irreparably damaged by current activities under current management.	See Response to Comment SD8-G-9.	
Mark W. Belles	I-112	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Mark W.	I-112	FM1	The designation of different fire management zones is	The BLM policy is to appropriately manage fire,	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Belles			a good plan, but plan direction should be detailed guiding the management team to gradually transition areas from a more human-managed fire area to a more naturally managed fire area.	whether prescribed or natural, to meet the overall management objectives related to maintaining healthy ecosystems and avoiding catastrophic wildfire. When opportunities arise to control natural fire in areas where such fire is desirable, the BLM will take such action. However, the BLM will maintain the option of prescribed fire in the absence of natural fire in order to achieve and maintain appropriate fire condition classes.	
Mark W. Belles	I-112	LG102 (LG-N)	Grazing management criteria should include periodic evaluation of grazing allotments and retirement of those allotments if the grazing is not maintaining minimum rangeland health criteria.	Policy and regulations including Standards for Rangeland Health provide steps to evaluate and adjust grazing.	
Mark W. Belles	I-112	RE31 (RE-K)	Areas open to OHV use should be very limited. Significant expanses of area should be closed to OHV use and the remaining areas should be limited to identified trails and roads.	Comment noted.	
Mark W. Belles	I-112	SD198 (SD-S)	I wish to identify areas that the BLM has overlooked that merit WSA designation. The areas are as follows: Bull Canyon- 2470 acres north and west of existing WSA, Daniels Canyon- 3100 acres adjacent to existing WSA, Diamond Breaks-4500 acres south of current WSA, Moonshine Draw-2700 acres north of Daniels Canyon WSA	No lands are proposed to be managed as Wilderness or WSA in any alternative of the DRMP/DEIS. However, the impacts of protecting Non-WSA lands with wilderness characteristics is fully disclosed in Chapter 4 of the DRMP/DEIS. The FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use. . . ." (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) The FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				current and future generations	
Tom McIntosh	I-113	RE32 (RE-L)	The amount of land closed to ORVs is miniscule compared to land opened to roads and trails. Why not more restrictions on ORV use?	Comment noted.	
Richard Lance Christie	I-114	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate,</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Gary C. Nichols	I-115	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Dee Tvedt	I-116	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Brian Gingras	I-117	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29</p>	
Suzanne Valencia	I-118	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Neil O. Miller	I-119	GC1	I/We support/favor the Great Dinosaur/Book Cliffs Heritage Plan.	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Neil O. Miller	I-119	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Neil O. Miller	I-119	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
James E. Kowalsky	I-120	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
James E. Kowalsky	I-120	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
James E. Kowalsky	I-120	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Lynn Hague	I-121	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Lynn Hague	I-121	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lynn Hague	I-121	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities,</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Lynn Hague	I-121	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Michael Cochran	I-122	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Michael Cochran	I-122	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Michael Cochran	I-122	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes	Non-WSA lands found either to have wilderness characteristics or likely to have wilderness	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Michael Cochran	I-122	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Edward and Sally Kosnik	I-123	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Edward and Sally Kosnik	I-123	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Edward and Sally Kosnik	I-123	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Justin Barnett	I-124	ME98 (ME-J)	Mineral leasing should be excluded from all areas proposed for wilderness designation in America's Red	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Rock Wilderness Act-25% of the planning area. It would be wiser to protect the 25% and allow leasing on the other 75% (instead of the 93% preferred plan) of the planning area as Utah citizen's groups have suggested.		
Justin Barnett	I-124	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Stephen D. Sandau	I-125	PA5 (PA-A)	A blanket "condition" for any member or formation without at least a cursory on-site observation by a qualified paleontologist could prove unbeneficial and unproductive for all involved. For an example, an obligation to monitor all parts of a unit classified as "Condition 1" would place undue costs and restrictions on private industries leasing BLM lands, as well as the lack of on-site observation by permitted paleontologists on units classified as "Conditions 2 & 3" might overlook important fossil reserves which would be destroyed in planned development.	<p>The paleontology condition classes have been replaced by the Potential Fossil Yield Classification (PFYC) system. This system allows for the authorized officer to call for paleontological survey and mitigation in areas of low potential where significant paleontological resources are known to occur or, conversely, not require survey in areas of high potential when the discovery of paleontological resources are known to be rare.</p> <p>The condition classes identified within the RMP are intended for use in broad-scale decision-making and general management guidance only. Each situation will be treated on a case-by-case basis, and stipulations will be tailored to be the most effective and appropriate for the circumstances.</p>	
Stephen D. Sandau	I-125	PA6 (PA-B)	There is no substitute for on-site observations of areas undergoing development on BLM lands in order to protect and preserve significant fossil materials. General outlines are useful in order to place emphasis on certain geological units, but the presence or absence of fossils within any given unit can change rapidly. More fossils by far are discovered and mitigated during the survey process than by monitoring of any given site during construction.	<p>See comment response PA5.</p> <p>Additionally, the BLM, as a matter of continuing policy, requires the assessment of each development area for a variety of resources, including paleontological resources, prior to any ground disturbance. These requirements are not reduced or altered by the inclusion of general</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				management approaches and assignment of condition classes within the RMP.	
Bill Robinson and Sheep Ranch Permitees	I-126	LG104 (LG-P)	Rather than continue to work with an unreasonable pre-May spring off date and go through the difficulty each year of seeking extensions of that date to deal with the lambing process, the more prudent route would be to permanently set those regular spring off dates for all winter sheep ranges to at or around May 20th to reflect the reality of the annual extensions given in the past. There is more than ample evidence, history, pattern and practice for BLM to adjust the regular spring off dates to at or around May 20th of each year. Accordingly, we request that the Vernal Draft RMP be revised to clarify these Winter Range spring off dates, setting those dates at or around May 20th of each year.	See comment response LG87.	
Brenda Durant	I-127	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Brenda Durant	I-127	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources) in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Brenda Durant	I-127	AT13 (AT-E)	In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Tom and Ann Yuill	I-128	AT25 (AT-Q)	The BLM's preferred alternative should not designate routes or allow for oil and gas leasing in areas with wilderness characteristics.	<p>As outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes.</p> <p>BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.</p> <p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness characteristics using other prescriptions to protect those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses.</p>	
Tom and Ann Yuill	I-128	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Eric Adman	I-129	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Ronald J. Parry	I-130	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Ted W. Yellman	I-131	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Loretta Dunne	I-132	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Dwayne Rowland	I-133	RE33 (RE-M)	Most baby boomers can only enjoy the beauty of these trails via ATV and wish to also protect the natural back road character of these areas.	Comment noted.	
Joan and Clyde McClelland	I-134	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Joan and Clyde McClelland	I-134	AT25 (AT-Q)	The BLM's preferred alternative should not designate routes or allow for oil and gas leasing in areas with wilderness characteristics.	As outlined in BLM Handbook H-8550-1, Interim Management Policy for Lands Under Wilderness Review, cross country OHV travel is not allowed. OHV travel in areas with wilderness characteristics would be restricted to designated routes. BLM is not required to protect all lands with wilderness characteristics. The Federal Land Policy and Management Act (FLPMA) and BLM policy require that FLPMA Section 603 wilderness study areas (WSAs) be managed to preserve their wilderness characteristics until Congress either designates them wilderness or releases them for other uses. WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review (IMP) until Congress acts.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>Other "non-WSA lands with or likely to have wilderness characteristics" are found in the Vernal Field Office. These non-WSA lands include those lands found to have wilderness characteristics in the 1999 Utah wilderness inventory, and those lands the field office preliminarily determined were likely to have wilderness characteristics through an interdisciplinary review of new information that was submitted by the public.</p> <p>Though BLM is precluded from managing non-WSA lands under the IMP and the Section 603 non-impairment standard, both FLPMA Sections 201, 202, and 302 and IM Nos. 2003-274 and 2003-275 Change 1 provide that BLM may elect to manage non-WSA lands with or likely to have wilderness characteristics using other prescriptions to protect those characteristics. This is accomplished through land use planning. For instance, the Affected Environment (Chapter 3) section of the RMP/EIS identifies the non-WSA lands with or likely to have wilderness characteristics. The various resource program sections of the Alternatives (Chapter 2) portion of the RMP/EIS describe how the lands are proposed to be managed. The Environmental Consequences (Chapter 4) section of the RMP/EIS discloses the effects the actions of each alternative would have on the wilderness characteristics of these lands.</p> <p>In sum, through land use planning, BLM will decide which lands will be managed to protect the values associated with wilderness characteristics and</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				which lands will be managed for other resources values and uses.	
Joan and Clyde McClelland	I-134	GC32	The draft RMP does not protect sensitive public lands from oil and gas development.	Comment noted.	
Debby Walter	I-135	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
T.R. Davis	I-136	GC54 (GC-K)	The glossary fails to adequately describe just what surface disturbing actions are. Please make sure that this is rectified. Surface disturbing actions should be those that disturb the mineral soil.	See comment response GC15.	
T.R. Davis	I-136	SW27 (SW-F)	In the Soils/Water section, the RMP fails to even consider managing the public lands on a watershed basis. The document notes that the planning has been mapped by hydrologic units at the fifth and sixth level. It seems like this is the time to start managing watersheds based on the fifth level of delineation.	The BLM has included watershed-based actions in Management Common to All alternatives. See Table 2.1.17 (Soils and Water Resources) of the PRMP/FEIS.	
T.R. Davis	I-136	WH35 (WHA)	I am deeply concerned about the amount of horse use that is occurring in the Winter Ridge area. It appears that any alternative to keep the horses in this area would result in continued degradation of the vegetative resource. I urge the BLM to select the alternative that removes the horses from this area.	Table 1.25 (Wild Horses) of the PRMP/FEIS provides specific information regarding management decisions related to wild horses.	
Brit Harvey	I-137	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses. Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				wildlife and wildlife habitat. See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.	
Rich Moser	I-138	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
John R. Swanson	I-139	SD104	I urge the establishment of Habitat Sanctuary Preserves to save all species, including the following: Black-footed Ferret, Canada lynx, Bald Eagle, Mexican Spotted Owl, Yellow-billed Cuckoo, Bonytail, Colorado Pikeminnow, Humpback Chub, Razorback Sucker, Horseshoe Milk Vetch, Graham's Beard Tongue, White River Beard Tongue, Burrowing Owl, Long-billed Curlew, Clay Reed Mustard, Shrubby Reed Mustard, Uintah Basin Hookless Cactus, Ute Ladies Tress, Townsends Big-eared Bat, White-tailed Prairie Dog, Ferruginous Hawk, Greater Sage Grouse, Northern Goshawk, Colorado River Cutthroat Trout, Roundtail Chub, Park Rockcress, Smooth Green Snake, and Flannelmouth Sucker.	See Response to Comment SD103-I-46.	
William Simpson	I-140	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Alison Kennedy	I-141	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				TR29.	
Alison Kennedy	I-141	GC31	I am not in favor of this RMP – it does not do a good enough job of protecting wilderness, which is not only personally important to me, but is also vital to the economy of our state.	Comment noted.	
Mary Moran	I-142	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Mary Moran	I-142	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Mary Moran	I-142	TR13	The thousands of miles of motorized routes in the Vernal Field Office's BLM lands are excessive and damaging. The conversion of mere tracks into designated routes just encourages off-roaders to blaze new routes. All of these routes cause damage to soils and vegetation, and usually replace native plants with non-native and often invasive ones. They also disturb species of wildlife sensitive to human intrusion. The BLM should work to close routes in any proposed wilderness lands. There will still be thousands of miles of routes even if these are closed.	Table 2.1.20 (Special Designations – Wilderness Study Areas) under the subsection entitled states that the goal will be to: “Manage WSAs as directed in the Interim Management Policy (IMP) For Lands Under Wilderness Review (H-8550-1) in a manner that does not impair their suitability for designation as wilderness.”	
Charles F. Belmont	I-143	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Ronald G.	I-144	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Harris				considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Patricia H. Miller	I-145	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Rose Difley	I-146	PA1	The Utah Professional Paleontologists Council of which I am a member is proposing that BLM land with geologic formations which have high potential for scientifically valuable fossil resources should be protected from destruction by OHVs. It is recommended that geologic formations should be given a rating for fossil potential. Those formations with high potential should be off limits to free-ranging OHVs. Instead the OHV use should be limited to thick Quaternary deposits or igneous and metamorphic formations where fossil potential is low or non-existent.	Routes being designated through the RMP are existing routes where disturbance has already occurred. No new routes are being proposed for construction. Impact assessments for the routes will be carried out as part of the implementation plan that will be prepared subsequent to the RMP. All geologic formations in the state of Utah, including the Vernal area, have been assigned a Potential Fossil Yield Classification (PFYC).	
Ezra Thomas Jones	I-147	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Ezra Thomas Jones	I-147	RE31 (RE-K)	Areas open to OHV use should be very limited. Significant expanses of area should be closed to OHV use and the remaining areas should be limited to identified trails and roads.	Comment noted.	
Ezra Thomas Jones	I-147	SD188 (SD-I)	I urge that the following streams be designated as a National Wild and Scenic River as they contain outstanding natural qualities: Argyle Creek, Bitter Creek, Evacuation Creek, Lower, Middle & Upper	See Responses to Comments SD14-G-3 and SD8-G-9.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Green, Upper, Nine Mile Creek, and White River.		
Mark Schoen	I-148	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as wilderness.	Comment noted.	
Charles W. Phy and Susan A. Phy	I-149	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Mary Stults	I-150	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Richard McCracken	I-151	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Penny Schiller	I-152	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Jeff Crider	I-153	AT16 (AT-H)	We urge BLM to give complete protection to wilderness values in all the areas proposed for designation as	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			wilderness.		
Stephen Borton	I-154	AT3	The preferred alternative provides for opening as much as 93% of the area to oil and gas development and to the development of off-road vehicle motorized use with little consideration given to preserving opportunities for other recreational activities and the protection of wildlife habitat.	<p>Table 2.1.13 (Recreation Resources) and Table 2.1.22 (Travel – Roads and Trails) describe management goals and prescriptions for recreational uses.</p> <p>Table 2.1.21 (Special Status Species) 2.2.24 (Vegetation Resources), and Table 2.1.26 (Wildlife and Fisheries Resources in the PRMP/FEIS describe management goals and prescriptions for wildlife and wildlife habitat.</p> <p>See comment responses AT1, TR13, TR20, TR24, TR29, and TR38.</p>	
Stephen Borton	I-154	LG103 (LG-O)	I would ask that when you do grant oil and gas leases, more consideration be given to the impact of these leases on existing grazing permits.	The anticipated impacts of minerals and energy management decisions on livestock and grazing are discussed in Section 4.7.2.3, and summarized in Table 2.28 in the PRMP/FEIS under Livestock & Grazing. Where specific considerations for livestock and grazing are appropriate, the BLM includes such considerations and stipulations in lease notices.	
Stephen Borton	I-154	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Stephen Borton	I-154	RE34 (RE-N)	Regarding OHV and Travel, I support Alternative C, which protects 366,559 acres.	Comment noted.	
Stephen Borton	I-154	SD186 (SD-G)	We support the following designations from Alternative A: Upper Green River-22 miles, Lower Green 30 miles. We support the following designations from Alternative C: White River- 44 mile stretch, Middle Green 36 mile stretch, Nine Mile Creek 13miles.	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Stephen Borton	I-154	SD199 (SD-T)	If I understand Table 2.2 ACEC properly, then I support Alternative A designation status for Red Mtn/Dry Fork, Lower Green R., Browns Park, and Bitter Creek. I support Alternative C which designates as ACECs the White River, Nine Mile Canyon, and 4 Mile Wash.	Comment noted.	
Kenneth C. Parsons	I-155	AT47 (AT-T)	I support Alternative A. It seems to strike the best balance of use and access versus protection and sequestering.	Comment noted.	
Kenneth C. Parsons	I-155	SD201 (SD-U)	I would like to speak about the White R. corridor. Should this section (14 miles upstream from UT/CO border to Bonanza Br.) be designated as wild and scenic, it quite likely will begin attracting recreational canoeists in much larger numbers. This in turn will lead to a need to permit the access to the river just to protect it from those who would love to see it. So while I encourage protection of this fragile riparian area in the midst of the desert, I strongly discourage the wild and scenic designation. I feel that the river can be adequately protected by the ACEC designation w/ out the notoriety that would accompany a W&SR designation.	See Responses to Comments SD8-G-9, SD19-G-22, AND SD20-G-25.	
Susan Lefler	I-156	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Susan Lefler	I-156	ME61	Areas proposed for wilderness in America's Redrock Wilderness Act should be closed to oil and gas leasing.	Comment noted.	
Susan Lefler	I-156	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>disturbed (Table 2,1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Violet Schwartz Corkle and William I. Corkle	I-157	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Jan and Gayla Kobialka	I-158	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	<p>The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives.</p> <p>See comment responses GC68, TR13, TR22, and TR29.</p>	
Jan and Gayla Kobialka	I-158	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
C. Loran Hills	I-159	AT2	Please, consider the Great Dinosaur/Book Cliffs Heritage Plan in the RMP.	See comment response AT1.	
Doris and Joel Arshalomov	I-160	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p> <p>BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.</p>	
Paul J. Ebbert	I-161	AT5	A transportation/travel plan should be included as part of the RMP/DEIS	<p>As stated in Table 2.1.22 (Travel – Roads and Trails) in the PRMP/FEIS under Management Actions Common to All Alternatives:</p> <p>“...the BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>For purposes of analysis, county travel plan maps were used to identify existing roads and trails.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.	
Paul J. Ebbert	I-161	CR15	Nine Mile Canyon needs special consideration. Prior to the last RMP, I was told by the then-BLM director that the area had no commercial value and therefore there was no threat to the unique archaeological and cultural resources. This is clearly not true. Please give Nine Mile Canyon real and meaningful protection.	Portions of Nine Mile Canyon would be designated as an Area of Critical Environmental Concern (ACEC) under all alternatives, though the specific acreage included in the ACEC under each alternative varies. This designation is based largely on the cultural resource values of the area. Details of the proposed acreages and stipulations for Nine Mile Canyon under each alternative can be found in Table 2.1.18 (Special Designations – Areas of Critical Environmental Concern) of the PRMP/FEIS.	
Paul J. Ebbert	I-161	GC30	I believe that recent attempts to streamline the oil and gas leasing and drilling have led to instances of Endangered Species Act, NEPA, and FLPMA being circumvented. All actions taken within the resource area must conform to current laws.	Comment noted.	
Paul J. Ebbert	I-161	SD101	The proposed White River wilderness area is a unique resource in this part of the state: a river that can be canoed safely, even by families. It is a remarkable canyon that deserves protection.	See Response to Comment SD1-I-1.	
Paul J. Ebbert	I-161	SD102	All the WSA's and areas identified with wilderness characteristics need to be protected until Congress decides to act. Once an area's wilderness qualities are lost, a decision is made by default; a circumstance that does not serve the citizens well.	See Response to Comment SD1-I-1 and SD8-G-9.	
Paul J. Ebbert	I-161	WF65	The Book Cliffs area is well known for its wildlife. This current RMP plan threatens that status. Alternative C provides some measure of protection but nowhere near	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>enough. Deer, elk, bear and mountain lion populations will be adversely affected by the extent of proposed oil and gas exploration and drilling. Elk calving areas, migration corridors, and ecosystems are not adequately protected.</p>		
Nancy Bostick	I-162	AT13 (AT-E)	<p>In order to minimize resource and user conflicts, the BLM's preferred alternative should not designate routes or allow oil and gas leasing in areas with wilderness characteristics, including Bitter Creek, Upper Desolation Canyon, Wolf Point, White River, and lands surrounding Dinosaur National Monument.</p>	<p>Non-WSA lands found either to have wilderness characteristics or likely to have wilderness characteristics will be managed according to the direction established in this land use plan. Unlike for WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. In Alternative B, most of the non-WSA lands are open to oil and gas leasing subject to standard terms and conditions. On the other hand, Alternative C is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, some non-WSA lands would be closed to leasing and most non-WSA lands would be leased subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative D reflects existing management direction, and Alternative A (the Preferred Alternative in the draft plan) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.</p> <p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate,</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.	
Nancy Bostick	I-162	AT33 (AT-Z)	Adopt alternative C Areas of Critical Environmental Concern (ACEC's) so that sensitive habitat is protected against new development and unnecessary travel.	Comment noted.	
Nancy Bostick	I-162	AT34 (AT-AA)	Alternative A does not provide the appropriate protection for the wilderness values that the agency itself identified in those areas.	Alternative A includes land use provisions such as no surface occupancy, controlled surface use, and timing restrictions in non-WSA lands identified as having wilderness characteristics, to the extent these lands are located within and/or contribute to the designation of the area in which they are located as ACEC's or other special management areas. Additionally, OHV travel would be restricted to designated routes only throughout the planning area, including lands with wilderness characteristics. Table 2.1.10 (Non-WSA Lands with Wilderness Characteristics) in the PRMP/FEIS provides information on management provisions in areas with wilderness characteristics. These management provisions are further describes in Section 4.24 in the PRMP/FEIS.	
Nancy Bostick	I-162	GC1	I/We support/favor the Great Dinosaur/Book Cliffs Heritage Plan.	Comment noted.	
Nancy Bostick	I-162	GC52 (GC-K)	The RMP does not do enough to protect the wilderness values in Vernal BLM District public lands.	Comment noted.	
Nancy Bostick	I-162	GC53 (GC-L)	The draft RMP, as it is, is far too heavily weighted in favor of oil, gas, and minerals and fails to address the needs of ranchers, non-motorized recreation, cultural resource protection and more importantly, Utah's	Management prescriptions providing for livestock & grazing can be found in Table 2.1.8 (Livestock and Grazing Management) in the PRMP/FEIS.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			wildlife.	<p>Provisions for cultural resources protection can be found in Table 2.1.4 (Cultural Resources) in the PRMP/FEIS.</p> <p>Provisions for recreation can be found in Table 2.1.13 (Recreation Resources) in the PRMP/FEIS.</p> <p>Provisions for wildlife can be found in Table 2.1.26 (Wildlife and Fisheries Resources) in the PRMP/FEIS.</p>	
Nancy Bostick	I-162	PR40 (PR-A1)	The outline developed during the Book Cliffs CRMP TRT breakout sessions need to be revisited with the suggestions created during that time implemented. Hundreds of hours were spent by volunteers to create a document that reflected an honest attempt to arrive at consensus by diverse group from the local community including conservationists, agency personnel, extractive industry representatives, recreation interests and those concerned about grazing. It appears that much of this information has been largely ignored in favor of extractive industries.	The Book Cliffs CRMP was reviewed and used as a baseline during the development of the alternatives. Alternatives proposed in the initiative were either brought forward or are included in the Alternatives Eliminated From Detailed Analysis (Section 2.4 of the PRMP/FEIS)	
Nancy Bostick	I-162	RW19 (RW-A)	We urge the BLM in the final plan to include measures that will restore those substandard riparian areas: (a) close OHV routes in riparian areas (b) adjust livestock grazing to foster restoration of natural riparian habitat.	Comment noted.	
Nancy Bostick	I-162	SD213 (SD-HH)	There are a number of important areas where the ACEC boundaries, closed to OHV boundaries and Oil and Gas Mineral Resources should be about the same. These areas include Four Mile Wash, White River and Main Canyon ACEC.	See Response to Comment SD125-G-1.	
Nancy	I-162	TR23	Allow UDWR input on construction of all new roads.	UDWR, or any other interested party, is encouraged	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Bostick		(TR-G)		to submit comments on any NEPA document.	
Nancy Bostick	I-162	TR24 (TR-H)	Evaluate roads impacts on wildlife as part of adaptive management process. The chosen RMP must assess these impacts and devise ways to mitigate them.	The mitigation measures for all alternatives are presented in Section 4.15.3 (Special Status Species Mitigation Measures) and Section 4.19.4 (Wildlife and Fisheries Resources Mitigation Measures).	
Nancy Bostick	I-162	TR25 (TR-I)	Continue to collect wildlife distribution data to study our knowledge of impacts on wildlife.	Comment noted.	
Nancy Bostick	I-162	TR26 (TR-J)	BLM needs a consistent approach to identifying roads for closure and reclamation. BLM should close roads that don't have specific ongoing purpose or those which provide redundant access.	BLM is committed to continue working with the counties on this purpose. See comment response TR17.	
Nancy Bostick	I-162	TR27 (TR-K)	BLM should identify roads that harm wildlife, or increase the likelihood of noncompliance with conservation mandates, then close, reroute or limit use to reduce their impacts.	Individual projects are analyzed in the NEPA process for potential impacts to resources within the Vernal Field Office. The RMP is used as a broad scale analysis to provide direction to management. New proposed activities, including roads, are currently analyzed for potential adverse affects on all resources, including wildlife.	
Nancy Bostick	I-162	TR28 (TR-L)	Plan for and implement staged development with regards to road construction and energy development.	Comment noted.	
Nancy Bostick	I-162	TR29 (TR-M)	Although the RMP has designated areas and routes for OHVs, the need for an extensive and detailed travel plan has never been more critical. OHV abuse has escalated to the detriment of most other recreational uses and traditional values like grazing, property rights, and non-motorized recreation such as hiking, horseback riding etc...	The BLM agrees that OHV use requires implementation of a management strategy to control impacts from this activity. To this end, Table 2.1.22 (Travel – Roads and Trails) of the PRMP/FEIS states that it's goal is to: "Establish working partnerships with local and state agencies, user groups, commercial providers, and other interested parties that would facilitate effective OHV program development including the planning for and implementation of successful trail systems	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>and use areas. Provide areas for OHV and motorized use, while protecting other resource values.”</p> <p>Later in Table 2.1.22 under the subsection entitled Management Common to AI Alternatives, it states:</p> <p>“In collaboration with interested parties, BLM would make future route adjustments based on access needs, recreational opportunities, and natural resource constraints. These adjustments would occur only in areas with open and/or limited route designations and would be analyzed at the activity planning level.”</p> <p>Further, Table 2.1.22 outlines the proposed management actions relative to OHV for each alternative. Readers should note that Alternatives A, B, C, and E all implement a change from existing policy in that OHV travel would be permissible only on designated routes and in designated areas. OHV outside of these routes and areas would not be permissible.</p>	
Nancy Bostick	I-162	WF103 (WF-A)	<p>Through the Vernal RMP revision, implement road closure plans to meet the following scientifically derived standards within crucial winter range migration routes:</p> <p>Mule deer-increase amount of core habitat within crucial winter range and migration routes that is greater than 1,542 feet from a road</p> <p>Pronghorn-increase core area that is farther than 3,168 feet from a road and reduce road densities to less than one mile per square mile</p>	Please refer to comment response SS149.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Elk-reduce road densities to less than 1 mile</p> <p>Sage Grouse-Implement seasonal road restrictions where possible, barring traffic within 656 feet of winter habitat, within 3 miles of leks, nesting and brood-rearing areas. Impose a 30mph speed limit during non-restricted hours.</p>		
Candee Pearson	I-163	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites."	
Candee Pearson	I-163	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
Garry Mott	I-164	AT27 (AT-S)	Alternative C is clearly the preferred choice because it is the least environmentally damaging.	Comment noted.	
Garry Mott	I-164	RE35 (RE-O)	Finally Alternative C provides the remaining wild country in your planning area the greatest measure of protection from the ravages of OHV use. Even your own State Director acknowledged in a recent Salt Lake Tribune article that the BLM is "playing catch up" with this very damaging recreational pursuit.	See the RPRM/FEIS. Alternative E provides the largest range of protection for lands with wilderness characteristics.	
Garry Mott	I-164	VI4	It is a tiring adage of the Bush Administration when describing the effects of Oil and Gas in terms of only acres disturbed. In fact, the impact when considered in terms of the overall degradation of visual quality is huge when drill pads are seen for miles around. Again, Alt C is the alternative that affords the most protection.	Comment noted.	
Graham Stafford	I-165	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Graham Stafford	I-165	SD249 (ASD-5)	BLM should take appropriate actions to protect 720,000 acres of the Utah Wilderness Coalition's (UWC) Citizen Proposed Wilderness Lands -- areas such as Upper Desolation Canyon, Desbrough	See Response to Comment SD1-I-1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Canyon, White River, Dragon Canyon, Sweetwater Canyon, Moonshine Draw, and Bull Canyon.		
Graham Stafford	I-165	TR34 (ATR-2)	BLM should establish a reasonable balance of recreation and wilderness protection in its transportation plan. No routes should be left open unless they serve some legitimate and identified purpose, and all off-road vehicle trails not designated "open" in the citizens' Heritage plan should be closed.	See comment responses TR18, TR29, and TR36. BLM considered the heritage plan in the preparation of their travel options outlined in the RMP.	
Bryan Wyberg	I-166	GC84 (JGC-6)	Under this new plan, this extraordinary region would be forever altered by opening nearly the entire monument to oil and gas leasing and uncontrolled unrestricted off-road vehicle use. A majority of Americans, including myself, believe this is not acceptable.	The BLM assumes that the commenter is referring to the Dinosaur National Monument. The RMP does not establish any management actions or decisions for this area as it is administered by the National Park Service.	
Bryan Wyberg	I-166	SD290 (JSD-34)	BLM SHOULD TAKE APPROPRIATE ACTION TO COMPLETELY PROTECT THE ENTIRE 720,000 ACRES WITHIN THE VERNAL DISTRICT THAT ARE CONTAINED IN THE UTAH WILDERNESS COALITION'S CITIZEN PROPOSED WILDERNESS LANDS. THESE LANDS INCLUDE UPPER DESOLATION CANYON, DESBROUGH CANYON, WHITE RIVER, DRAGON CANYON, SWEETWATER CANYON, MOONSHINE DRAW, AND BULL CANYON. BLM RECOGNIZES 275,000 ACRES AS HAVING OR LIKELY TO HAVE WILDERNESS CHARACTERISTICS BUT OFFERS NO ALTERNATIVES THAT MANAGE THESE AREAS IN WAYS THAT WILL EFFECTIVELY PROTECT AND ENHANCE THEIR WILDERNESS CHARACTER. THIS IS AN UNCONSCIONABLE ABROGATION OF THE AGENCY'S RESPONSIBILITIES AS STEWARDS OF THE LANDS. BLM NEEDS TO DEVELOP AN IMPROVED MANAGEMENT PLAN THAT PROTECTS BOTH THESE 275,000 ACRES AND ALSO THOSE ADDITIONAL ACRES CONTAINED IN THE CITIZENS' WILDERNESS PROPOSAL.	See Response to Comment SD1-I-1.	
Bryan Wyberg	I-166	SD291 (JSD-35)	BLM MUST MAINTAIN THE WILDERNESS CHARACTER OF THESE LANDS UNDIMINISHED UNTIL AFTER CONGRESS ADDRESSES THE OPTION OF WILDERNESS DESIGNATION OF	See Response to Comment SD1-I-1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			THESE LANDS. AMERICA'S RED ROCK WILDERNESS ACT ENJOYS SUBSTANTIAL SUPPORT IN BOTH THE HOUSE AND SENATE. THIS IS AN ISSUE UNDER CONGRESSIONAL CONSIDERATION NOW, THEREFORE IT IS THE BLM'S RESPONSIBILITY TO ENSURE THAT THE LANDS UNDER CONSIDERATION ARE PROTECTED UNTIL CONGRESS HAS MADE ITS JUDGMENT AND PASSED A WILDERNESS ACT COVERING THE VERNAL DISTRICT'S LANDS.		
Bryan Wyberg	I-166	TR38 (JTR-2)	BLM must establish a reasonable balance of recreation and wilderness protection in its transportation plan. Hikers, backpackers, river runners, hunters, etc., treasure the area for its abundant whitewater opportunities, big game and backcountry wilderness, yet their interests are given little consideration in this RMP proposal.	<p>The BLM is mandated by FLPMA and other legislation and policy to manage lands under its jurisdiction for multiple use and sustained yield. These multiple uses include, among other things, both motorized and non-motorized activities. The management actions within the RMP include provisions for allowing OHV travel, while restricting the extent of the area within which this activity can occur. The RMP also includes such actions as designation of SRMAs, ACECs, and WSRs that provide opportunities for non-motorized recreation.</p> <p>See comment responses TR20 and TR36.</p>	
Bryan Wyberg	I-166	TR39 (JTR-3)	ORV regulations and enforcement needs to be increased so that it stops ORV-caused landscape visual effects, stops ORV-related unpleasant experiences for the majority of users and stops destruction of fragile ecosystems. The Citizen's Plan recognizes the multiple use character of the BLM but restricts ORV use to areas where its damaging effects can be reduced or contained.	<p>See comment responses TR22, TR29, and TR38.</p> <p>The Travel Plan to be completed following the RMP would incorporate education, information, monitoring and enforcement as critical components to the plan to ensure its success.</p>	
Bryan Wyberg	I-166	TR40	Vehicles should be restricted to designated roads and trails throughout the entire resource area, no "open"	Alternatives A, B, C, and E propose travel restrictions through management areas, which differ	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
		(JTR-4)	ORV play areas (with the possible exception of certain small, manageable areas that do not conflict with other resource values).	<p>from the open OHV conditions under the existing management plan.</p> <p>Alternatives A, B, C, and E identify four small “open” areas (approx. 300-600 acres in size each). They have been located in areas already devoid of most vegetation and are relatively innocuous to resource issues.</p> <p>Also see comment responses TR22, TR29, and TR38.</p>	
Bryan Wyberg	I-166	TR41 (JTR-5)	All routes should serve some identifiable purpose. If there is no compelling reason for a route to stay open, it should be closed.	Comment noted.	
Bryan Wyberg	I-166	TR42 (JTR-6)	The transportation plan must continue to make sense until the next management revision, 15-20 years from now. Use levels will almost certainly be higher with time, so any routes designed now must be capable of sustaining high use without causing ecological damage or ruining the peace and quiet that most visitors come to experience. There needs to be adequate opportunities for non-motorized and motorized groups while avoiding conflict between the 2 groups.	<p>The BLM is striving to meet the increased demands of all of its multiple-use groups. The proposed RMP is designed to help the BLM manages these conflicting resources.</p> <p>See comment response TR29 regarding future adjustments to the RMP related to travel.</p> <p>Also see comment response TR38 regarding non-motorized and motorized vehicle use in the planning area.</p>	
Bryan Wyberg	I-166	TR43 (JTR-7)	Many of the pervasive threats to biological diversity—habitat destruction, fragmentation, exotic species, pollution, etc, as well as CR vandalism—are exacerbated by the existence of roads. There should be a “closed unless signed open” policy. This policy makes it very easy for visitors to determine what is	See comment responses TR22, TR29, TR38, and TR45.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			open and what is not.		
Bryan Wyberg	I-166	TR44 (JTR-8)	As user levels increase, combining non-motorized and motorized users on the same trail system becomes unacceptable. There needs to be a fair allocation between motorized and non-motorized users.	See comment response TR38.	
Bryan Wyberg	I-166	TR45 (JTR-9)	Ecologically damaging routes, such as routes through riparian areas or important wildlife habitat, should be closed.	See Table 2.1.13 (Recreation Resources) of the PRMP/FEIS under the Standards for Rangeland Health Recreation Guidelines 1: In all other areas, travel routes and other disturbances should be kept to the minimum necessary to provide access and visitor facilities appropriate to the area. Through blocking, signing, and public education, unneeded travel routes should be eliminated and rehabilitated and unplanned development of new ones discouraged. It may be necessary to manage some areas to be entirely free of planned travel routes.	
Bryan Wyberg	I-166	TR46 (JTR-10)	There needs to be adequate opportunities to get out of earshot of motorized trails. Currently a large majority of lands managed by BLM are within 1 mile of a motorized trail or road. This is not acceptable. Many routes which penetrate deeply into otherwise roadless areas should be closed in order to provide a more balanced spectrum of near-road and far-from-a-road recreational opportunities.	See comment response TR38 regarding balancing motorized versus non-motorized vehicle use, FLPMA, and closing of roads.	
Dwayne Rowland	I-167	GC72 (AGC-1)	Please do not support any new wilderness areas and manage for all citizens.	Comment noted.	
Dwayne Rowland	I-167	TR33 (ATR-1)	BLM should continue to manage these areas with all citizens in mind, not just a few who would deny access to these remote areas. I am 60 years of age and the only access I would ever have to these places is via	It is the BLM's plan, in development of the Activity Level Travel Plan that will be completed following approval of the proposed RMP, to collaboratively work with individuals, groups, and governments to	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			ATV trails.	produce a network of both motorized and non-motorized trails to accommodate many users including those with limited abilities. See comment response TR29.	
Martin D. McGregor	I-168	SD254 (ASD-10)	The Colorado and Green Rivers and probably others be nominated or suggested for designation example (if it's in your area) : Ruby-Horsethief of the Colorado as scenic, Westwater as wild – etc.	Ruby-Horsethief and Westwater are administered by the Moab Field Office.	
Martin D. McGregor	I-168	TR36 (ATR-4)	...a travel plan similar to the Price-San Rafael area should be adopted (closed unless signed or mapped as open).	Table 2.1.22 outlines the proposed management actions relative to OHV for each alternative. Readers should note that Alternatives A, B, C, and E all implement a change from existing policy in that OHV travel would be permissible only on designated routes and in designated areas. OHV outside of these routes and areas would not be permissible.	
Laird Fetzer Hamblin	I-169	AT60 (JAT-11)	Alternative C should protect all areas in the VPA determined to be of wilderness character with Wilderness designation. And this should be the chosen alternative. Of the 1,725,512 ac in the VPA, very little remains relatively pristine. Only 328, 374 ac are identified by the LM to be or likely to be pristine enough for wilderness designation. These tracts of unfragmented, undisturbed lands are important refuges for wildlife and reserves for native plants. They are also important as undisturbed watersheds. It is critical that these lands not be further fragmented and that current fragmentation be reduced by the reclamation of unnecessary roads.	Comment noted.	
Laird Fetzer Hamblin	I-169	AT61 (JAT-12)	Alternative C should not allow any mineral extraction of any kind on portions of the VPA currently undisturbed by these activities, and this should be the chosen alternative. Alternative C is currently not significantly	The Draft EIS evaluated a range of alternatives in detail to assure a balanced approach was recommended that allows opportunities for mineral exploration and production and for the BLM to	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>different from any of the other alternatives. Undisturbed portions of the Tavaputs plateau and other undisturbed areas of the VPA are valuable to our nation and the local community as wild reserves for native plants and animals and as uncontaminated watersheds. This value is far greater than any temporary gain for the nation or local community in extraction of oil gas or minerals. Often the effects on wildlife from exploration and extraction have not been fully accounted for.</p>	<p>protect the resources and resource uses. A supplement to the Draft RMP was later issued to consider Non WSA lands with wilderness characteristics. The management actions proposed under the Alternatives offer management flexibility to ensure resources are protected while allowing for acceptable levels of mineral development. Additionally, as exploration and production activities proceed, impacts (short and long term) will be evaluated in subsequent NEPA documents.</p>	
Laird Fetzer Hamblin	I-169	AT62 (JAT-13)	<p>Alternative C should allow for no grazing of livestock or feral animals (horses or other). This should be the chosen alternative. Desert lands such as these are incapable of withstanding grazing and trampling by livestock. It is critical that livestock not be grazed on these lands, and that feral horses be removed.</p>	<p>The BLM is required to evaluate a range of alternatives in detail to assure a balanced approach was recommended that allows opportunities for legitimate land uses, including livestock and wild horse grazing, and for the BLM to protect the resources and resource uses. The management actions proposed under the Alternatives offer management flexibility to ensure resources are protected while allowing for acceptable levels of land and resource uses. The RMP addresses the permitted use on those allotments that are available for livestock grazing per BLM handbook 1601, Appendix C page 14. In compliance with laws, regulation and policy, grazing permits are subject to review and evaluation before the permits are renewed. If necessary to maintain rangeland health, adjustments are made to the level of grazing use based on monitoring data and sound best science methods. Additionally, annual adjustments are made to the grazing use based on current range conditions and forage production amounts, including adjustments during periods of range depletion due to "severe drought or other natural causes" (43 USC 315b). Monitoring data is systematically collected to determine if a statistically significant change of the</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				resources has occurred. The data is collected and evaluated using best science methods to make any necessary changes in management practices or authorized livestock forage level. Regular monitoring and adjustments, as necessary, ensure healthy sustainable rangeland ecosystems are maintained.	
Laird Fetzer Hamblin	I-169	AT63 (JAT-14)	Riparian areas are particularly vulnerable to disturbance and contamination. 89 rivers were identified as potentially eligible for Wild and Scenic River designation, but only 6 of these rivers have been proposed. Only Alternative C includes all 11 of the river segments proposed as Wild and Scenic River designation. Even this designation will only protect 216 miles of river. It is therefore critical that this Alternative is chosen.	Comment noted.	
Laird Fetzer Hamblin	I-169	GC81 (JGC-4) (JGC-5)	Of the 1,725,512 ac in the VPA, very little remains relatively pristine. Only 328,374 acres are identified by the BLM to be or likely to be pristine enough for wilderness designation. These tracts of unfragmented, undisturbed lands are important refuges for wildlife and reserves for native plants. They are also important as undisturbed watersheds. It is critical that these lands not be further fragmented and that current fragmentation be reduced by the reclamation of unnecessary roads. Alt C should protect all areas in the VPA determined to be of wilderness character with Wilderness designation. And this should be the chosen alternative.	Comment noted.	
Laird Fetzer Hamblin	I-169	GC83 Y(JGC-5)	The EIS is well researched and well written. However, in many instances the intended action is inadequate for the preservation and protection of the environment and the species that inhabit it.	Comment noted.	
Laird Fetzer	I-169	LG182	Instead of artificial water sources, such as guzzlers,	Protections for riparian areas as related to grazing	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Hamblin		(JLG-9)	natural riparian areas should be restored to a properly functioning condition. To do so would require the permanent removal of all livestock and feral species. It would also require eradication of non-native plant such as tamarisk.	<p>are outlined in the Grazing in River Corridors subsection to Table 2.1.8 (Livestock and Grazing Management) and Table 2.1.16 (Riparian Resources).</p> <p>Noxious weed control, including control of tamarisk, is discussed in Table 2.1.23 (Vegetation) in the PRMP/FEIS as well as Sections 3.16.2</p>	
Laird Fetzer Hamblin	I-169	RE59 (JRE-14)	OHV use is particularly damaging to cryptobiotic soils and vegetation. The use of OHVs should be kept to maintained roads and a few designated trails where it is determined they will not have adverse effects on the environment or wildlife species and where they will not adversely affect non-motorized use of the area.	<p>As stated in Table 2.1.17 (Soil and Water Resources) under the subsection entitled Management Actions Common to All Action Alternatives:</p> <p>" Specific activities that would include biological crust considerations would be prescribed fire, post-fire management, invasive weed control, energy development, grazing, OHV use, and range improvement projects. Biological crusts will be considered along with all other resource values in site-specific NEPA analyses."</p> <p>Also, management actions would include identifying and avoiding biological soil crusts.</p>	
Laird Fetzer Hamblin	I-169	SD289 (JSD-33)	Many areas in the VPA have been identified as ACECs. All currently designated ACECs should be continued and all proposed ACECs should be designated. The Nine Mile Canyon ACEC is currently severely adversely affected by oil and gas exploration and extraction. Nine Mile Canyon should be designated, as proposed, to be an Archaeological district on the NRHP.	See Response to Comment SD27-G-22.	
Laird Fetzer	I-169	SW33	The EIS recognizes importance of biological soil crusts	Table 2.1.17 (Soil and Water Resources) of the	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Hamblin		(JSW-4)	and identifies that no current data exists on the VPA for soil crusts. It is critical that BLM immediately initiate such studies and take the necessary action for protect biological soil crust. All actions causing soil disturbance on the VPA must be carefully considered and limited to necessary actions. Disturbances to saline soil must also be avoided to keep them from contaminating the surrounding watershed.	PRMP/FEIS outlines management actions common to all alternatives relative to biological soil crusts. Specific plans to avoid, minimize, or mitigate the potential impacts of land use on watersheds in areas where saline soils and biological soil crusts are present will be developed at the project-level stage, when details related to the precise location and nature of a proposed undertaking are known. See comment response SW39.	
Laird Fetzer Hamblin	I-169	WF132 (JWF-22)	EIS states that in the VPA there are 15 species of plants and animals federally listed as T&E and 1 candidate species. EIS states that there are 28 species considered by Utah to as sensitive to becoming endangered. Both of these lists are incomplete for the federal and state species documented to or expected to exist in the VPA.	At the time of Draft RMP publication, the listing of federal and state special status species was complete, based on information obtained from the USFWS and Utah DWR. The Final EIS has been updated to include the latest and most current T&E and special status species designations.	X
Laird Fetzer Hamblin	I-169	WF133 (JWF-23)	It is critical that predators of native wildlife be allowed to flourish and those previously removed by reintroduced, thereby regulating the numbers of wild animals. If the numbers of a native animal species are still damaging the landscape, then hunting or other means of culling should be used.	Comment noted.	
Susan Potts	I-170	AT1	Adopt the Great Dinosaur/Book Cliffs Heritage Plan.	The Great Dinosaur/Book Cliffs Heritage Plan was considered and elements of this plan have been incorporated into the alternatives. See comment responses GC68, TR13, TR22, and TR29.	
Susan Potts	I-170	SD249	BLM should take appropriate actions to protect 720,000 acres of the Utah Wilderness Coalition's	See Response to Comment SD1-I-1.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
		(ASD-5)	(UWC) Citizen Proposed Wilderness Lands -- areas such as Upper Desolation Canyon, Desbrough Canyon, White River, Dragon Canyon, Sweetwater Canyon, Moonshine Draw, and Bull Canyon.		
Laird Fetzer Hamblin	I-171	GC81 (JGC-4) (JGC-5)	Of the 1,725,512 ac in the VPA, very little remains relatively pristine. Only 328,374 acres are identified by the BLM to be or likely to be pristine enough for wilderness designation. These tracts of unfragmented, undisturbed lands are important refuges for wildlife and reserves for native plants. They are also important as undisturbed watersheds. It is critical that these lands not be further fragmented and that current fragmentation be reduced by the reclamation of unnecessary roads. Alt C should protect all areas in the VPA determined to be of wilderness character with Wilderness designation. And this should be the chosen alternative.	Comment noted.	
Laird Fetzer Hamblin	I-171	LG181 (JLG-8)	Grazing in the VPA has caused severe changes in the abundance or absence of native plant species and has led to the establishment of exotic plant species as well as severe erosion. The EIS lists some of the adverse impacts of livestock on wildlife and wildlife habitat. However, many adverse impacts of livestock are not sufficiently addressed. Instead of artificial water sources, such as guzzlers, natural riparian areas should be restored to a properly functioning condition. To do so would require the permanent removal of all livestock and feral species. It would also require eradication of non-native plants such as tamarisk. It is critical that livestock, and feral animals, horses or other not be grazed on the VPA.	See comment responses to LG26, LG46, LG134, and LG182.	
Laird Fetzer Hamblin	I-171	RE58 (JRE-13)	EIS lists some adverse effects of recreation and particularly of OHVs on wildlife and wildlife habitat. But does not sufficiently show the adverse effects of	As stated in Table 2.1.15 (Recreation – Travel Maintenance and Development) in the PRMP/FEIS under the subsection entitled Goals and Objectives,	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>recreation and especially of OHVs on wildlife and wildlife habitat. Recreation effects on wildlife is well documented, attached is list of studies and Montana Chapter of Wildlife society has vast bibliography that would aid in the EIS evaluation of recreation impacts. OHV use allows for presence of people in almost all areas of the landscape, enabling for a constant disturbance and harassment of wildlife. The use of OHVs should be kept to maintained roads and a few designated trails where it is determined they will not have adverse effects on the environment or wildlife species.</p>	<p>the PRMP/FEIS complies with the BLM National OHV policy (43 CFR 8340), and protects other resources while providing areas for OHV use.</p> <p>The BLM National OHV policy includes trail designation criteria :</p> <p>“...to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, to prevent impairment of wilderness suitability.”</p> <p>The BLM National OHV policy also requires that:</p> <p>“...trails be located to minimize harassment of wildlife and/or cause significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.”</p>	
Laird Fetzer Hamblin	I-171	RW28 (JRW-1)	<p>A baseline inventory of birds in the Book Cliffs was completed in 1998. 87 species were identified. A similar study should be conducted for the rest of the VPA. 20 riparian areas were used for the study. Most of these were classified by the BLM as to their functioning condition. One was classified as non-functioning, 9 classified as at-risk, 5 as properly functioning and 5 not classified. Grazing is listed as the factor affected their functioning. These and all other riparian areas on the district need to be evaluated and action taken to restore and maintain them in proper functioning condition.</p>	<p>See comment response RW1.</p> <p>As presented in Table 2.1.16 (Riparian Resources) of the PRMP/FEIS, the range of proposed management actions for riparian resources includes actions to improve and/or maintain riparian proper functioning condition.</p>	
Laird Fetzer	I-171	SS156	EIS states that in the VPA there are 15 species of	The commenter does not provide any information to	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Hamblin		(WF116) (JWF-6)	plants and animals federally listed as T&E and 1 candidate species. EIS states that there are 28 species considered by Utah to as sensitive to becoming endangered. Both of these lists are incomplete for the federal and state species documented to or expected to exist in the VPA.	substantiate the assertion that the species listing was incomplete. At the time of EIS publication, the listing of federal and state special status species was complete, based on information obtained from the USFWS and Utah DWR. See comment response SS75.	
Laird Fetzer Hamblin	I-171	SW32 (JSW-3)	4 streams (Pariette Draw, Nine Mile Creek, Willow Creek, Ashley Creek) in or adjacent to the VPA are listed as water quality limited in DWQ 2002 River and Stream Analysis. Also Cliff Creek has very high selenium content and is in a very degrade condition due to livestock use. These streams and the adjacent BLM lands needs to e evaluated and action taken to return them to a pristine condition.	See comment response SW31.	
Laird Fetzer Hamblin	I-171	WF115 (JWF-5)	Many native species inhabit the VPA; all are ecologically important. Effects on habitat need to be considered when any action is decided upon. It is not sufficient to maintain only portions of a species' habitat.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF117 (JWF-7)	UDWR lists 52 state sensitive species within the VPA. Continual monitoring should be done to verify the existence, abundance and needs of each of these species and the fragile habitats they rely on must be preserved.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF118 (JWF-8)	A small population of mountain plovers on Myton Beach is in need of special protection. Any use of the area that directly or indirectly affects the plovers or their habitat should be avoided. This study shows a steady decline in numbers. Evaluation of the condition of habitat there should be undertaken immediately. May be due to increase in oil and gas production. Livestock grazing should be discontinued in on Myton Beach.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to read as follows: "Manage non-listed sensitive species and the habitats upon which they depend in such a manner as to preclude the need to list them as either threatened or endangered under the Endangered Species Act. The guidance for this management is	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				put forth in the BLM 6840 Manual.”	
Laird Fetzer Hamblin	I-171	WF119 (JWF-9)	An evaluation of burrowing owl populations on the district should be undertaken.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF120 (JWF-10)	Current guidelines to avoid negative impacts to raptors should be followed. The location of raptor nests should be continued monitored through careful collaboration with the UDWR.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF121 (JWF-11)	The black-footed ferret population introduced to the district should be continuously monitored in collaboration with UDWR. Any activities which adversely affect the ferret or their habitat would be avoided.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF122 (JWF-12)	4 species of endangered fish reside in the Green River. Contamination of the Green River by oil or gas exploration and extraction on adjacent lands must be strictly avoided. Degradation of the surrounding landscape by grazing must be avoided. Continued collaboration with UDWR and FWS to ensure the species' survival is critical.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF123 (JWF-13)	Sage grouse should be protected by strict use of the current guidelines. Critical sage grouse habitats have been identified. Continuous monitoring of the greater sage grouse and all lek sites and all critical habitats should be conducted in collaboration with UDWR.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF124 (JWF-14)	One record exists of the of Eureka mountain snail in the Uintah basin. A study should be conducted to more fully determine its existence.	A study on the mountain snail is beyond the scope of the Final EIS. Studies would be conducted site-specifically through project-related NEPA analyses, processes, and documents.	
Laird Fetzer Hamblin	I-171	WF125 (JWF-15)	17 species of bats reside in the VPA. So studies have been undertaken to determine the presence or abundance of bat species. Such a study should be undertaken to better understand their habitat needs.	A study on 17 bat species is beyond the scope of the Final EIS. Studies would be conducted site-specifically through project-related NEPA analyses, processes, and documents.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Laird Fetzer Hamblin	I-171	WF126 (JWF-16)	A black bear was collared in 2002 to evaluate the effects of 3D seismic studies in the Book Cliffs. Study shows activities associated with the exploration and extraction of oil and gas can impact bears. This study should be continued and expanded.	A study on black bears is beyond the scope of the Final EIS. Studies would be conducted site-specifically through project-related NEPA analyses, processes, and documents.	
Laird Fetzer Hamblin	I-171	WF127 (JWF-17)	Critical winter and summertime antelope, deer and elk habitats have been identified. These areas need to be continually monitored to see that they are not degraded by excessive species' numbers, or by other activities. Some areas have been very impacted by oil and gas; further impacts to these habitats by oil and gas extraction should be avoided. Some of these habitats are wilderness-quality and should be maintained in that condition with designation as Wilderness.	As stated in Table 2.1.6 (Forage All Localities) of the PRMP/FEIS: "Monitoring would be used to determine the amount of forage available for livestock, wildlife and wild horses. Results of monitoring would be used to adapt management strategies to prevent deterioration of rangelands, to achieve desired resource conditions, and to meet other resource objectives." Also, refer to comment response WF102.	
Laird Fetzer Hamblin	I-171	WF128 (JWF-18)	Large predators are important to proper function of ecosystem. Return of grey wolf and grizzly would enhance the diversity of wildlife. All possible habitats of the lynx should be preserved. Corridors for the dispersal of these species onto and through the district should be maintained. The designation of all qualifying land as Wilderness would greatly work towards this end.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF129 (JWF-19)	If the numbers of a native species are still damaging the landscape then hunting or other means of culling should be used to keep them in check.	Comment noted.	
Laird Fetzer Hamblin	I-171	WF130 (JWF-20)	A baseline inventory of small terrestrial vertebrates of the East Tavaputs Plateau was done in 1994. A similar study should be conducted for the rest of the VPA.	A study on terrestrial invertebrates is beyond the scope the Final EIS. Studies would be conducted site-specifically through project-related NEPA analyses, processes, and documents.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Laird Fetzer Hamblin	I-171	WF131 (JWF-21)	A baseline inventory of birds in the Book Cliffs was completed in 1998. 87 species were identified. A similar study should be conducted for the rest of the VPA. 20 riparian areas were used for the study. Most of these were classified by the BLM as to their functioning condition. One was classified as non-functioning, 9 classified as at-risk, 5 as properly functioning and 5 not classified. Grazing is listed as the factor affected their functioning. These and all other riparian areas on the district need to be evaluated and action taken to restore and maintain them in proper functioning condition.	Wetland and riparian management actions (Table 2.3) and resources objectives and goals (Section 2.4.12) are proposed for maintaining, protecting, improving, and expanding this resource.	
Letitia Kilgrew	I-172	RE43 (ARE-1)	As a home owner I would like to see OHV use constrained to at least 2 miles from any residence. I would also like to see them limited to trails that go somewhere, not allowing them to congregate in a small area, which creates a large dust and nuisance problem and causes severe erosion of the hills.	Comment noted.	
Bill Robinson	I-173	AT40 (AT-GG)	The DRMP/DEIS fails to do a proper alternatives analysis under NEPA. It fails to comply with NEPA because it failed to explore and objectively evaluate all reasonable alternatives. The range of alternatives discussed only differed on minor matters and provided no real alternatives other than the relatively minute differences between A, B and C. It fails to include an alternative that would preclude ORV use in WSAs, proposed and other areas the VFO has found to have wilderness qualities.	ORV use is precluded within WSAs in all alternatives. The RMP presents four alternative proposals for managing public lands in the VPA. The alternatives were developed in response to the issues identified in the public scoping process and the planning criteria. The BLM recognizes that social, economic, and environmental issues cross land ownership lines and that extensive cooperation is needed to actively address issues of mutual concern. To the extent possible, these alternatives were crafted utilizing input from public scoping comments, Duchesne, Daggett, and Uintah County representatives and other cooperating agencies.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>Through its land use planning revision process and to comply with the FLPMA multiple-use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area.</p>	
Bill Robinson	I-173	CR24 (CR-B)	<p>The DRMP/DEIS fails to comply with the National Historic Preservation Act. Although the DRMP and DEIS discuss cultural considerations in regard to preservation of prehistoric artifacts and historic landmarks, it does not adequately address the impact of its decisions upon rural agricultural customs and traditions in the region.</p>	<p>Cultural Landscapes are an accepted means for managing sites and areas where a common theme of human land use has occurred. This is a management tool similar to a National Register District where management is aware of special needs for the preservation of a segment of our cultural heritage. Local or regional heritage is considered in the establishment of special designation areas with the associated themes.</p>	
Bill Robinson	I-173	CR25 (CR-C)	<p>The NHPA mandates, in the BLM's own words from the RMP/EIS, "the consideration of avoidance or mitigation of adverse impacts on cultural resources or traditional cultural places that are either listed on or have been determined eligible for the NRHP." The BLM ignores this mandate and claims, "since the locations of every single eligible site within the planning area are not known, largely because of the dearth of investigative surveys that have been conducted, it is not possible to provide a comprehensive list or map of all such sites." If the BLM does not know the location of all the sites eligible for listing on the NRHP, how can those sites be afforded the same level of protection? The BLM must know the location of historic sites and the potential impacts before a fully informed decision can be made.</p>	<p>It is not necessary for the BLM to know the exact location and National Register eligibility status for every single cultural resource site in the Vernal Field Office in order to establish broad management decisions in the RMP. Rather, the BLM must ensure that consideration of impacts to NRHP-listed or NRHP-eligible resources is given when specific impacts are identified. To this end, the BLM requires that undertakings with the potential to impact cultural resources are assessed for potential adverse effects and include such steps as resource identification, resource evaluation, and resource avoidance or impact mitigation. That is, all undertakings are subject to review under Section 106 of the National Historic Preservation Act. Further, the BLM has identified several areas within the VPA where special designations such as ACECs would be established, in some cases in</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				large part to protect cultural resource values. These special designations invoke management protocols that afford equal consideration to both known and as-yet-unidentified cultural resources.	
Bill Robinson	I-173	LG86	It should be noted that section 3.7 contains serious errors. In the first part of this section it states that "comprehensive grazing allotment information is summarized in Appendix N." Appendix N does not exist. The reader has no way of knowing which allotments make part of what areas.	Appendix L in the PRMP/FEIS has been revised to correct grazing allotment information.	X
Bill Robinson	I-173	LG116 (LG-BB)	The DRMP fails to properly address grazing related issues under federal law, regulation and policy. Prior to the DRMP/DEIS the number of AUMs allocated to wildlife differs from the DRMP DEIS. Every alternative besides the no action alternative would increase the number of AUMs to wildlife. The BLM has cut a valid and recognized public use, livestock grazing, without proper or sufficient justification. In order to reallocate AUMs in such a manner, the BLM must provide sufficient justification for the change, particularly in light of the TGA. See inconsistencies on Table 2.3 (p. 43) and Table 4.16.1	The allocation of resources on BLM lands is an appropriate use of the BLM Land Use Planning process. The range of alternatives, as stated in the DRMP/EIS, provides for an analysis of the impacts of changing the current allocation (Alternative D). FLPMA provides BLM the authority to allocate resources and determine what uses will be made of the BLM lands in the LUP process. Also, see comment response LG88.	
Bill Robinson	I-173	LG117 (LG-CC)	It is apparent that the Vernal BLM intends to retire grazing preferences on at least eight allotments. DRMP/DEIS does not contain any supporting language or citation to regulation or law to support this move to retire grazing preference. Before such a retirement is done, the BLM must make an affirmative determination that livestock grazing is not chiefly valuable before grazing preferences are retired	The seven allotments referred to in Table 2.1.6 (Forage – All Locations) in the PRMP/FEIS were retired and the AUMs were allocated to wildlife in 1964 and 1982 as mitigation due to the loss of deer habitat by the Flaming Gorge Reservoir project and the Central Utah Project. This decision is being brought forward from the 1994 Diamond Mountain RMP. Table 2.1.6 also authorizes a livestock grazing prescription.	
Bill Robinson	I-173	LG118 (LG-DD)	The DRMP makes several references that improperly distinguish types of livestock grazing and their effects. Specifically, the DRMP/DEIS makes references that	The BLM is not proposing to require operators to change class of livestock.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>indicate that sheep grazing is uniquely damaging to the range conditions and health as compared to that of other livestock or wildlife. From this unsupported conclusion, the DRMP/DEIS makes several unsupported references that suggest that sheep grazing will be likely changed to cattle. The BLM, however, then does not substantiate or support these conclusory comments with any scientific evidence.</p>		
Bill Robinson	I-173	LG119 (LG-EE)	<p>The BLM in its DRMP/DEIS fails to acknowledge the significant benefits that properly managed sheep grazing can have on the condition of the range and environment. There is a sizeable amount scientific research that shows that sheep grazing can improve wildlife habitat (see Comment letter I-173for references). These studies need to be properly addressed before the BLM continues in its unjustified position regarding sheep grazing and then require a change from sheep to cattle grazing.</p>	<p>The following references have been added to the PRMP/FEIS:</p> <p>Jeffery C. Mosely, Prescribed Sheep Grazing to Enhance Wildlife Habitat on North American Rangelands. "Sheep Research Journal", 1994, pp. 79-91;</p> <p>K.M. Havstad, Sheep Grazing as a Rangeland Improvement Tool, " Sheep Research Journal," 1994, pp. 72-78;</p> <p>B.E. Olson and J.R. Lacey, Sheep: A Method for Controlling Rangeland Weeds, "Sheep Research Journal," 1994, pp. 105-112.</p> <p>See comment response LG118.</p>	X
Bill Robinson	I-173	LG120 (LG-FF)	<p>If in fact the BLM can properly substantiate that the class of livestock is directly responsible for impacting the range conditions, then the BLM must consider alternatives and options to address such issues and not merely force an operator to change class of livestock.</p>	<p>See comment response LG118.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Bill Robinson	I-173	LG121 (LG-GG)	The DRMP specifically addresses the seasons of use for grazing. The alternatives are all different and the DRMP/DEIS neither indicates whether other options were considered and eliminated nor whether hybrids of the proposed alternatives were considered. The DRMP does not provide any information as to why the methods or means utilized in the alternatives were selected and included for each alternative. It does not include any information as to what is the standard generally used by the BLM for determining grazing seasons of use or any information as to what type of determination generally is best for the affected environment with any explanation or justification.	The PRMP/FEIS provides five different alternatives analyzing a wide range of issues. These issues were developed on the basis of public scoping. See comment response LG87.	
Bill Robinson	I-173	LG122 (LG-HH)	The proposed season of use in the DRMP is not only limited to four hard and fast alternatives for determining the season of use, it is also constrained by seven areas. (Figures 7-10). The reasoning for delineating these areas in the manner done by the BLM is without explanation or justification. The area titled "area 6" is enormous as compared to the other areas. The DRMP fails to explain the disparity in the size of the grazing areas boundaries but then goes on to try and establish grazing seasons of use based on these arbitrarily delineated areas.	See comment response LG87.	
Bill Robinson	I-173	LG123 (LG-II)	The DRMP fails to identify what allotments are located within what area. Thus, a permittee has no way of knowing with any certainty what the DRMP is proposing will be the season of use for their permits. A permittee has no actual notice of exactly how their permit and the season of use will be affected. This eliminates the effectiveness of a comment period for the permittees to make substantive comments. The BLM should remedy this error and seek to address a season of use for each allotment instead of the macro-level treatment that is currently within the DRMP/DEIS.	The addition of allotment boundaries and names in Figures 7 – 10 would have made the figures unreadable so a seasons of use code has been added to the Appendix L (Grazing Allotment Table). This will indicate which allotments fall within which seasons of use area.	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			This would best serve the environment and allow for the best and proper management of the range of resources within the VPA.		
Bill Robinson	I-173	LG124 (LG-JJ)	These requirements are not only unduly burdensome on the applicant but are also arbitrary, capricious and contrary to law.	These requirements are criteria to be used to help maintain, or move the allotments in the direction to meet or exceed Rangeland Health Standards.	
Bill Robinson	I-173	LG125 (LG-KK)	The DRMP does not discuss other alternatives that may be used to improve range and soil conditions in times of "drought." Other measures that should be considered include the removal of wild horses, and reduction in wildlife numbers. Acknowledge the possibility of alternatives that could improve range conditions through seeding and water/irrigation improvement projects.	The BLM has the authority under the Wild Horse and Burro Act to implement an emergency gather due to drought or other climatic events, the UDWR has the ability to increase or extend hunts for the same purpose.	
Bill Robinson	I-173	LG126 (LG-LL)	The DRMP has a crucial mistake in that it fails to define the critical term "drought". A definition should be included so that the affected parties can know with certainty when the BLM will begin taking actions that will limit or reduce permitted activities within BLM managed lands.	As defined by the Society for Range Management, "prolonged dry weather when precipitation is less than 75% of the average amount" (SRM 1989)	
Bill Robinson	I-173	LG127 (LG-MM)	One way of dealing with the ambiguity created by the lack of a definition of "drought" in the document is to use adaptive management for forage and range conditions to determine conditions long before a full-fledged drought has occurred and before damage is exacted on range that cannot support the permitted use.	Comment noted.	
Bill Robinson	I-173	PR11 (PR-B)	The DRMP/DEIS contains no substantive baseline. Generally the baseline for an action in a DEIS is within the affected environment section of the document. The term baseline is not mentioned. It shows that information is not readily apparent if it does exist. It fails to establish a needed baseline with vegetation, riparian and wetland resources, and soil and water	Appendix C Chapter 3 of the DEIS outlines the baseline data for each resource area appropriate to the programmatic nature of the RMP. The sections within Chapter 3 establish the existing condition (the baseline) for the various resources and issues. The use of the term "baseline" is not required.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			resources.		
Bill Robinson	I-173	PR12 (PR-D)	The DRMP / DEIS fails to use the requisite scientific information objectively. The impacts analysis under NEPA is supposed to be objective and unbiased. The document fails to use this level of objectivity in its analysis to determine potential impacts of the actions or alternatives presented, especially with regard to the oil and gas development. The DRMP/DEIS does not hide the issue that significant oil and gas development will occur, with intensity. The BLM's research has shown that where some of the development (especially roads) associated with oil and gas would be constructed that the lands are of such a nature that they will not be able to every properly recover after being used. In essence, some of these adverse environmental effects will be permanent. While it is not our position that oil and gas development should be banned, it is our position that the BLM must comply with the regulations as well as use the best resources possible to evaluate the environmental costs of this type of intensive single use. The BLM should revise the DRMP/DEIS to include the best scientific information possible and then objectively include and analyze such in its planning documents.	The commenter does not provide specific examples of what scientific information exists that would have been more accurate than the information used in the preparation of the DRMP. As such, the BLM cannot address this comment other than to say that the BLM used the best information available to it at the time the RMP was prepared.	
Bill Robinson	I-173	PR14 (PR-E)	The DRMP/DEIS fails to properly implement a monitoring plan for adaptive management. By merely stating that monitoring will occur the document fails to provide any specificity with regards to the essentials of the BLM's monitoring strategy. Without this, the proposed plan lacks teeth for implementation or enforcement. It is also important to note that the DRMP expressly states that adaptive management will be implemented for the areas related to grazing and OHV, but fails to state that adaptive management will be implemented and used with regard to oil and gas	Monitoring plans would be developed as a part of the implementation of the final RMP. For oil and gas activities, monitoring plans are based on the site-specific NEPA analyses, which relate back to the objectives in the RMP.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			development.		
Bill Robinson	I-173	PR16 (PR-F)	The mitigation measures of the DRMP/ DEIS are inadequate and not in compliance with NEPA. The measures are vague and nondescript. This is especially true with mitigation impacts from oil and gas development. The stipulations are vague and general as well. The DRMP fails to discuss any of the mitigation measures taken or proposed for implementation to reduce the adverse impacts, both permanent and not, to grazing and other multiple-uses on allotments within the VPA. The final DRMP should contain specific discussion and analyses of mitigation measures for the impacts of an action/alternative, the feasibility of such measures, the costs for such, who will bear the burdens of such costs, the adequacy of such measures, etc....	Mitigation of adverse impacts must be tailored to the specific details of those impacts and the resources involved in order to be effective. As the RMP is a programmatic document that implements broad management decisions, the individual details of each possible impact on a real-time, on-the-ground basis are not known. Such details become available only at the project-level stage. While the BLM can commit in the RMP to an overarching management philosophy of implementing mitigation when and where appropriate, it cannot outline the specific details of individual impact mitigation without pre-supposing the nature, extent, and exact location of the impact. As such, the details of mitigation are deferred to the project-level stage of NEPA analysis.	
Bill Robinson	I-173	PR21 (PR-G)	The DRMP DEIS is overly generalized and vague rendering the ability to provide substantive public comments as moot.	Comment noted.	
Bill Robinson	I-173	PR22 (PR-H)	The BLM cannot pick and choose which executive orders it seeks to comply with and then discard or disregard the other applicable executive orders. Other orders that should have been included and analyzed would include: 13211 (Energy Effect Analysis); 11644 (Use of ORV on Public Lands); 11988 (Floodplain Management); 12898 (Civil Justice Reform Analysis); 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations); 12630 (Governmental Actions and Interference With Civil Constitutionality Protected Property Right); 13132 (Federalism Analysis) and 12866 (Regulatory Planning and Review). Should also address Small Business Regulatory Flexibility Act, 5	The BLM acknowledges that it must comply will all applicable laws, Executive Orders, regulations, and Bureau policies regarding public land management. This is a base assumption of daily BLM operations and, by extension, of the RMP. Under NEPA, an agency must take a 'hard look' at environmental consequences, however, an EIS 'need not be exhaustive to the point of discussing all possible details bearing on the proposed action.'"	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			(USC 601-612 and the Small Business Regulatory Enforcement Fairness Act of 1996 and Utah Statute Annotated 63-38d-401 (Planning duties of the planning coordinator and office).		
Bill Robinson	I-173	PR41 (PR-A2)	The DEIS fails to include sufficient mitigation measures under NEPA.	<p>The RMP/FEIS is a programmatic document that establishes general management approaches, goals, and broad actions governing large-scale land use decisions. Specific mitigation measures must be developed at the stage at which the exact location and nature of probable impacts is known in order to be the most effective (i.e., site-specific mitigation). Mitigation cannot be presupposed in a programmatic document and be expected to be accurate, effective, and feasible over the life of the RMP.</p> <p>NEPA does not specify the nature or extent of mitigation measures that must be included in project planning.</p>	
Bill Robinson	I-173	PR-F	The mitigation measures of the DRMP/ DEIS are inadequate and not in compliance with NEPA. The measures are vague and nondescript. This is especially true with mitigation impacts from oil and gas development. The stipulations are vague and general as well. The DRMP fails to discuss any of the mitigation measures taken or proposed for implementation to reduce the adverse impacts, both permanent and not, to grazing and other multiple-uses on allotments within the VPA. The final DRMP should contain specific discussion and analyses of mitigation measure for the impacts of an action/alternative, the feasibility of such measures, the costs for such, who will bear the burdens of such costs, the adequacy of such measures, etc....	<p>Section 4.7 of the PRMP/FEIS identifies and discusses the potential impacts to livestock grazing from other resource values/uses, included necessary mitigation measures.</p> <p>In general, mitigation measures that are deemed to be necessary are borne by the proponent.</p>	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Bill Robinson	I-173	SD235 (SD- DDD)	The DRMP/DEIS fails to properly address wilderness issues. In the DEIS the BLM claims that they "have the authority to conduct inventories for characteristics associated with the concept of wilderness – and to consider management of these values in its land-use planning process." Pg. 3-87. Despite its claims, Section 201 of FLPMA does not provide the BLM with authority to conduct an inventory of the public lands for the single resource value of wilderness. Based upon BLM inventories and public proposals, the DEIS lists 13 non-WSA areas with wilderness characteristics. DIES pp. 3-87 to 3-88. The BLM claims that on these areas "management prescriptions may be tailored to restrict OHV use, apply no surface occupancy, or close lands to oil and gas leasing." The BLM must follow FLPMA's mandate of multiple use and sustained yield in managing these non-WSA areas.	See comment response SD234.	
Bill Robinson	I-173	SO41 (SO-L)	The DRMP/DEIS fails to conduct a proper economic analysis. The DRMP/DEIS in this case failed to properly include and assess the environmental impacts on the local economies that would be affected in particular with regard to the effect that reduced livestock grazing will have on the local economy. The alternatives of the DRMP/DEIS, besides the no action alternative, all consider reducing the number of AUMs for livestock, or calls for the reduction of only livestock use of the range. The BLM must consider the economic and historic contribution of ranching and livestock grazing to the local economy and balance that against the harm that will be caused to the economy if that grazing is reduced.	Section 4.12.3.1 in the PRMP/FEIS has been revised to assess the environmental impacts of the local economies. The proposed plan has no reduction in AUM's and is identical to the current situation (the No Action alternative).	X
Bill Robinson	I-173	SO42 (SO-M)	The DRMP/DEIS acknowledges the historic and economic contributions grazing and ranching has on local communities. The DRMP/ DEIS however, is devoid of discussion or analysis of the impacts that	Section 4.12.3.1 in the PRMP/FEIS has been revised to assess the historic and economic impacts of grazing and ranching on local communities.	X

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			reduced or eliminated or retired grazing preferences would have on local economies or on small businesses.		
Bill Robinson	I-173	WH20	It is our position that any reintroduction of wild horses in the Bonanza area, an area where the BLM claims is not currently meeting all rangeland health conditions, is illogical and would lead to further and increased deleterious effects to the rangeland resources. The BLM's previous failure to properly manage herd numbers in the Bonanza area along with the failures by other BLM field offices shows a pattern of inadequate management by the Vernal BLM and the BLM in general, before any wild horses are approved for reintroduction, a functional and practical management has to be instituted so that the numbers of wild horses do not exceed what is permitted and further injury caused by wild horse overgrazing will be avoided.	Comment noted.	
Bill Robinson	I-173	WH21	Before the BLM places any wild horses on the Bonanza allotment the issue of AUMs for such must be addressed. The DRMP has significant inconsistencies with regard to the AUMs within the VPA. These inconsistencies carry over to the Bonanza area. The BLM must address this AUM issue and make a determination that AUMs are available for wild horses on the Bonanza area.	The commenter does not identify what the inconsistencies in AUMs are. The BLM is unable to address this comment.	
Bill Robinson	I-173	WH22	Before the BLM finalizes the RMP and EIS, it should properly address the management concerns for the introduction of wild horses, as well as the impacts of such. The impacts would include the likely event of the BLM's failure to maintain the horses within the prescribed number for an area, alternatives, mitigation, and a system for quantifying damages or effects of such through a proper monitoring program.	The potential impacts of wild horse management decisions on other resources within the planning area are discussed in Chapter 4 for each resource for which impacts are possible.	
Smokey	I-174	AT48	The requirements of NEPA that require the BLM to use	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Rasmussen		(AAT-5)	the best available science and data indicate that the BLM should change the utilization dates on the McFarley Flat Allotment from the current dates of April 1-April 30 to the new dates April 21-May21. This change will be better for the resource because it will allow the grass to mature more prior to livestock grazing. This later date would also help alleviate the fire hazard because the livestock will graze some of the grass that dries up and becomes a fire hazard.		
Smokey Rasmussen	I-174	GC75 (AGC-4)	The DRMP/DEIS failed to do a proper Alternatives Analysis	Comment noted.	
Smokey Rasmussen	I-174	GC76 (AGC-5)	The DRMP/DEIS failed to include sufficient mitigation measures, contains no substantive baseline information, fails to use the requisite scientific information and objectivity, fails to properly implement a monitoring plan for adaptive management, fails to conduct a proper economic analysis, fails to properly address wilderness issues, and fails to comply with the National Historic Preservation Act (NHPA).	Comment noted.	
Smokey Rasmussen	I-174	LG79 (AAT-4)	The Stock-Raising Homestead Act of 1916, P.L. 290, authorized the Secretary of the Interior to withdraw land necessary for the moving of livestock to and from winter and summer ranges or shipping points. Permittees, including Mr. Rasmussen and his predecessors, have been using the Rough Trail Stock Driveway for more than 40 years. The BLM's failure to recognize and protect the ongoing use of the Rough Trail Stock Driveway is a violation of the National Environmental Policy Act (NEPA). A review of the DRMP also reveals that the BLM also failed to recognize other stock driveways, such as the Diamond Mountain Stock Driveway.	43 CFR 4130.6-3, Crossing Permits, provides for the authorization of livestock to cross public lands and/or other lands managed by the BLM. The DRMP as currently written does not restrict the authorization of crossing or trailing permits within the Field Office. Under 43 CFR 4130.6-3 the authorized officer has the authority to attach terms and conditions to the crossing authorization which limits the amount of time and location of the authorized trailing. The DRMP does not invalidate currently designated Stock Driveways within the Field Office.	
Smokey	I-174	LG135	The DRMP/DEIS is severely lacking in its approach to seasons of use. First the DRMP states that under the	See comment response LG87.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Rasmussen		(ALG-2)	BLM's preferred Alternative A, seasons of use would be based on phenology. The BLM ignores the fact that many currently existing grazing permits currently have a season of use.		
Smokey Rasmussen	I-174	LG136 (ALG-3)	Based on the Federal Lands Policy Management Act (FLPMA), the Public Rangelands Improvement Act (PRIA), and the Taylor Grazing Act (TGA), the BLM's approach in the DRMP and DEIS to limit or change the season of use is not legal. Furthermore, the mandatory requirements to change season of use the DRMP sets out at page 2-18 is also illegal. The BLM cannot use extortion in exchange for changing the season of use and still be in compliance with the law. Essentially, the BLM has a blank check to ask for whatever the agency currently thinks may be necessary for management practices in exchange for granting a change in the season of use.	See comment response LG87.	
Smokey Rasmussen	I-174	LG137 (ALG-4)	In the past, the BLM has conducted studies in areas fenced off from cows. Is this practice going to continue under the DRMP? If so, what is the BLM studying and what data has been gathered thus far?	Any fence studies already in place would continue until the study is completed. There are no new fence studies proposed in the Vernal Planning Area.	
Smokey Rasmussen	I-174	RE44 (ARE-2)	The McFarley Flat Allotment is close to town and receives a lot ORV use, which causes excessive damage to the range. The BLM should confine the ORV use to trails and should place one of the "special study grazing areas" where the ORVs regularly pass to determine the actual impact of the ORV use.	See comment response RE19.	
Chad F. Hamblin	I-175	AT46 (AAT-3)	As the plan is now written, I like alternative C the best in all aspects of the plan, and I hope you will reconsider and choose it as the preferred alternative. In addition, I support the comments of the Uintah Mountain Club and urge you to implement them in the plan, and I also endorse the comments being submitted by my brother, Laird Fetzer Hamblin (Commenter I-169).	Comment noted.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Chad F. Hamblin	I-175	GC73 (AGC-2)	I think that firewood gathering should be very much restricted. I don't like to see pinion and juniper cut in pristine areas, and I've seen a lot of damage to cryptogamic soil and other resources from people driving all over to cut trees. I don't think people should be allowed to leave designated routes in their vehicles when collecting firewood, and I think firewood gathering should be forbidden in all areas that could qualify as wilderness and in all ACEC's (wilderness and ACEC's often overlap). The only exception to this would be the collection of small pieces of dead wood by people camping, to be used in campfires.	Comment noted.	
Chad F. Hamblin	I-175	GC74 (AGC-3)	I think wildlife and archaeological resources should be given top priority in planning and management on this BLM land.	Comment noted.	
Chad F. Hamblin	I-175	LG134 (ALG-1)	I feel the alternatives in the plan don't cover the full range of options in regards to grazing. I think we need a "no-grazing alternative. Of all of the uses of our public lands I think grazing has had some of the most detrimental effects on the land, and I would like to see all grazing stopped on all public lands. I think that at the very least the BLM should have some large, wilderness-quality areas in which grazing is not allowed.	Livestock grazing is a valid existing right on public lands as mandated by the Taylor Grazing Act, FLPMA, and other federal legislation and policy for lands identified as chiefly valuable for that purpose. See the comment responses LG46 and LG60.	
Chad F. Hamblin	I-175	TR35 (ATR-3)	I feel that off-road vehicles should be limited to designated routes, and that no new routes should be developed for ATV use.	Comment noted.	
Chad F. Hamblin	I-175	VE11 (AVE-1)	I think what is meant by "vegetation treatments" should be more thoroughly explained in the plan. I didn't find "chaining" mentioned in the plan, but I know chainings have often been referred to as "vegetation treatments". Also, I've seen a lot of places on BLM land where all of the pinion/juniper trees are cut from large areas, and I don't see much difference between this and chaining. I	The BLM has intentionally declined to specify precise tools (e.g., chaining, specific herbicides, etc.) under these broad headings in order to allow flexibility in the treating vegetation over the life of the RMP.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>don't think either of these methods, or any other vegetation treatment- including poisoning or mechanical removal of sagebrush – should be allowed. I think there should be only two exceptions to this:</p> <p>1) controlled or natural burns should be allowed when appropriate (only when this won't hasten the spread of cheat grass)</p> <p>2) A full range of treatment options including the use of cutting and careful use of herbicides, should be allowed when dealing with exotic, invasive species – such as tamarisk.</p>	See comment response VE4.	
Jack Dobbins	I-176	GC78 (JGC-1)	Saddle Tree Draw and Atchee Wash should not be designated as open in order to preserve the primitive and wild characteristics of the area.	Comment noted.	
Jack Dobbins	I-176	ME95 (ME-G)	Several proposed wilderness areas in the planning area are part of America's Redrock Wilderness Act, a measure now pending in Congress. The DEIS is wrong to open much of this area to oil and gas leasing. The Vernal RMP should provide complete protection for the wilderness character of these areas by prohibiting oil and gas leasing and excluding Off Road Vehicles.	Comment noted.	
Jack Dobbins	I-176	RE46 (JRE-1)	No ORV routes should be designated in the Sand Wash area in order to preserve the non-motorized qualities of the Green River.	Sand Wash is proposed as Closed to OHV use under Alternative C.	
Jack Dobbins	I-176	TR18 (TR-B)	The BLM should not designate any roads inside [ARRWA] proposed wilderness areas.	See comment response TR13.	
N/A – Vernal at Meeting		GC48 (GC-F)	9 Mile Canyon- buildings look awful-eye sore-aluminum-south side of river –please consider camouflage-visually unappealing for tourists-hurts tourism.	The building being referred to is in the Price Field Office. This comment has been forwarded to them.	

INDIVIDUALS

Individuals	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
N/A – Verbal at Meeting		GC49 (GC-H)	Didn't like that they would not allow us to ask questions in open forum	Comment noted.	