

Visual Resource Management

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
State of Utah	G-1	VI26	We are concerned about the lack of real discussion in the Draft EIS about the management of visual resources. The proposed management prescriptions laid out on page 2-62 do nothing more than indicate the aggregate amount of acreage to be managed in each VRM management class. The management “common to all” discussion on page 2-36 indicates only, in one simple sentence, that the objectives for each specific visual resource management class, outlined in BLM Handbook H-8410-1, and repeated on page J-3, would be implemented.	Table 2.1.24 (Visual Resource Management) of the PRMP/FEIS Section 2.4.16.1 identifies the Goals and Objectives for visual resource management. Section 3.17 provides a discussion of the affected environment regarding visual resources. Section 4.17 provides a discussion of the environmental consequences for visual resources.	
State of Utah	G-1	VI27	We are concerned about the apparent lack of an updated visual inventory. This ties in with the rationale for the “Sensitivity Level Analysis” required by BLM Manual Handbook H-8410-1.III.A. - Factors to Consider. Many of these factors change over time, and a simple rollover of an older inventory would not accurately reflect these adjustments. In addition, the lack of updated inventory information makes interpretation of the differences between the inventory and management classes impossible to determine. The draft RMP needs to fully explain how the visual inventory was accomplished, so that differences in visual management prescriptions proposed in the various Alternatives may be compared to the inventory classes. This indicates to the reader exactly how the VRM management classes are assisting in the resource management goals of each Alternative.	<p>See comment response VI7A.</p> <p>Some major travel corridors were elevated in their visual sensitivity, (which is one of the criteria in visual sensitivity rating), because of the increase in use and visitation. Two areas were re-inventoried because of both the dramatic increase in oil and gas activity and the perceived increase of both user numbers and attitude perception toward natural landscapes. As a result of the re-inventories, both areas were elevated in VRM rating as seen in Figures 29 and 32 which are reflected in Alternatives A and D respectively.</p> <p>The alternatives provide a range of VRM classification from which management can select from for the final RMP and the VRM classification within the final RMP will be consistent with general overall management direction.</p>	
State of Utah	G-1	VI28	The maps on Figures 29-32 are hard to interpret	The BLM acknowledges that the scale of Figures	

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			<p>concerning the VRM management classes, as the figures are not specific enough to determine the exact geographic location of most of the boundary lines. Because of this, the counties cannot determine if the criteria for VRM inventory have been correctly followed, and exactly where, on-the-ground, the BLM proposes to change management from one class to another, except for certain geographical areas which fully correspond to other proposed management designations.</p>	<p>29-32 may not provide sufficient detail to delineate VRM boundary lines for the various classifications; however, electronic files are well defined and provide sufficient detail.</p>	
State of Utah	G-1	VI29	<p>The draft RMP purports to discuss the impacts of various resource management decisions on visual resources, but, in actuality, this discussion is either misleading or circular and non-responsive. As an example of a misleading statement, the discussion of VRM resources on pages 3-117 to 3-118 lays out the management criteria and requirements for the four VRM management classes. The discussion indicates that currently the only areas in the VFO managed as VRM management class I are Wilderness Study Areas, and one WSA equivalent, an Instant Study Area. It continues by stating that minerals exploration and development “is not presently exceeding VRM class objectives” throughout the Vernal Field Office, due to proper visual mitigation methods. Yet on page 4-122 the document indicates that VRM management classes I and II “allow little or no alteration to the line, form, color and texture that characterize the existing landscape,” thereby raising the potential for greater impacts to minerals development. On page 4-123, the analysis clearly states that an increase in the number of acres of VRM Classes I and II would lead to a direct decrease in the number of available well locations, thereby leading to less production (and royalties). We ask for clarification of the correct standards for VRM</p>	<p>Minerals exploration and development are presently occurring in areas not designated has high VRM classes but in areas of lower VRM classification (Class IV to be specific—see Figure 32), where greater levels of visual intrusion are tolerated. Smaller areas are designated as VRM Class III and Class II, wherein slightly higher restrictions on visual alteration exist and visual mitigation measures are used. As such, the DEIS statements referenced in the document are not contradictory. Under Alternatives A and C, changes in VRM classification across the VFO would increase the number of acres under Class I and II designation (with more VRM Class I under Alternative C than A). More of these VRM Class I and II areas would overlap with areas desirable for minerals and energy exploration and development. As such, under these alternatives, there would be greater impacts on minerals and energy development through increased restrictions related to visual resources management.</p>	

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			management in the VFO, and that the VFO analyze VRM I and II designations as a possible withdrawal of the mineral resources.		
State of Utah	G-1	VI30	We are concerned that the draft RMP is not specific about the sources and goals of many of the special management designations available to it, leading to circular and non-responsive reasoning in the analysis. For example on page 4-284 the impacts analysis for visual resources and special designations indicates that visual resources will be protected by designation of ACECs and Wild and Scenic River designations. This analysis proceeds under the general presumption that ACECs and WSR segments are “good” for visual resources, but fails to indicate the management prescriptions which actually accomplish this goal.	Table 2.1.18 (Special Designations – Areas of Critical Environmental Concern (ACECs)) of the PRMP/FEIS provides information about the management foci for each proposed ACEC or special designation. Many of these foci, such as controlling noxious weeds, limiting OHV use to designated routes, and establishing controlled surface use stipulations on minerals and energy exploration and development would reduce visual intrusions and alteration of the landscape. Such an outcome would be beneficial to the preservation of visual resources. Also, designation under the Wild and Scenic Rivers Act and through the ACEC process confers a level of resource management that protects and preserves the important and relevant values of an area from the potential effects of actions that would otherwise be permitted by the RMP. In general, emphasis is given to protecting the aesthetic, scenic, wildlife, historic, archaeological, unique or distinctive, and/or scientific features of these areas.	
State of Utah	G-1	VI31	Which designation - ACEC, WSR, SRMA or VRM management - is being proposed for the protection of visual resources? The VRM discussion mentions the others, while the ACEC discussion mentions the use of VRM classifications. This lack of clarity in proposed management prescriptions doesn't meet the requirements of full disclosure under the provisions of NEPA, and doesn't allow us to determine whether or not the BLM is proposing duplicate prescriptions, contrary to the provisions of state law, and the BLM's Manual on designation of ACECs.	Visual resources benefit from a variety of different special management designations, not just VRM classification. While VRM classification is specific to visual resources, ACEC, WSR, and SRMA designation can also consider visual resource values, and the management goals of such designations typically include actions that afford protection to visual resources as an ancillary benefit. Overlapping of program decisions is not optional for	

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				<p>BLM, but is required by the FLPMA, 1976 and National BLM planning and program specific regulations. The FLPMA directed that management of public lands be 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. For example, 43 CFR Group 2500 provides guidance and requirements for Disposition; Occupancy and Use of public lands; Group 2800 for Rights-of-way; Group 3400 for Coal Management; Group 6000 for Designated Wilderness, and Group 8200 for Natural History, part 8351 for Wild and Scenic Rivers. Multiple-use management requires a balancing of the mandates for these separate programs.</p> <p>BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (Appendix C, H-1601-1). The required decisions must be included in each of the alternatives analyzed during development of the RMP. The RMP will include the decisions required for each program.</p> <p>See comment response VI29.</p>	
State of Utah	G-1	VI32	<p>The counties and State of Utah cannot support any proposed VRM class management specifications that will prevent habitat enhancement, fuels reduction, and prescribed fire activities from occurring in the VFO. The RMP must choose VRM management classes which allow vegetation and habitat treatments that improve wildlife habitat and reduce the likelihood of catastrophic fire events.</p>	<p>The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and</p>	

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				<p>inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p> <p>Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.</p> <p>See also comment response VI1. No VRM classification precludes limited management actions, which may include fuels reductions, prescribed fire, and/or habitat enhancements. VRM Class I and II require that these management activities be conducted in ways that have minimal impact on visual resources over the long term.</p>	
State of Utah	G-1	VI38	State statute recognizes the need to protect the scenic resources of the state, and suggests that the BLM consider using VRM Class I management only for inventoried Class A scenery, or the equivalent, but also suggests that the BLM balance this type of protection against the needs of the other legitimate multiple-uses of the land. BLM Manual H-8410 provides that	<p>BLM IM-2000-96 (Use of Visual Resource Management Class I Designation in Wilderness Study Areas) states;</p> <p>“ . . . all WSAs should be classified as Class I, and managed according to VRM Class I management</p>	

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			Inventory Class I should only be assigned to those areas where a management decision has been previously made to maintain a natural landscape.	objectives until such time as the Congress decides to designate the area as wilderness or release it for other uses. If a WSA is designated as wilderness, the area would continue to be managed as VRM Class I.”	
State of Utah	G-1	VI39	Some of the proposed VRM boundaries follow the boundaries of old Wilderness Inventory Areas (WIAs), causing concern that these provisions for VRM management are substitutes for non-use or non-impairment standards, in contradiction to state law and the case of Utah v. Norton.	<p>See comment response VI1B</p> <p>The BLM is required to apply management prescriptions based upon a balanced consideration of resource values and land use needs. The BLM has done this independently of previous designations within the planning area. It is, however, no surprise that old WIAs were identified for areas with high visual resource values. The BLM cannot ignore these values simply because they fall within areas of former WIAs. Further, the BLM does not manage for non-impairment but for multiple-use and sustainable yield.</p> <p>Finally, the Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603’s non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process.</p>	
State of Utah	G-1	VI40	The State of Utah is concerned about the need for VRM Class I management within WSAs. The non-impairment management standards within WSAs is	See comment response VI38	

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			<p>very strict, protecting the wilderness character and characteristics until Congress makes a decision, yet allows for certain activities. The BLM has not demonstrated any need for the VRM classification within the WSAs, and has not analyzed how permitted activities within the WSAs, as limited as they may be, may be affected by the VRM classification. The state requests the BLM identify a real world need for the classification prior to its establishment.</p>		
State of Utah	G-1	VI41	<p>The proposed stipulation for VRM Class II Management is described on page K-10 within Appendix K. The wording for the proposed stipulation is simply a restatement of the descriptions found in Appendix J, and offers no further clarification to the reader about the BLM's intentions to manage under the VRM Class II designation. The State of Utah is concerned that the wording will constitute a severe restriction on legitimate multiple-use activities, especially in light of the wording on page 4-122; restrictions severe enough to constitute management under non-impairment standards. The state looks forward to working with the BLM and local government to clarify the management prescriptions for VRM II under this proposed stipulation.</p>	<p>See comment response VI1 and VI1E</p> <p>As stated in Appendix K (now J), the BLM's VRM Class objectives clearly describe the level of disturbances allowed within each VRM Class. Site-specific project-level activities are beyond the scope of the RMP's programmatic EIS. However, site-specific analyses of impacts to and mitigation of scenic quality and the landscape would be conducted through other site-specific NEPA processes and documents.</p> <p>The commenter should note that oil and gas activities have been performed in VRM II areas. The use of mitigation techniques such as low profile tanks, low gloss matching paints, winding roads, staining disturbed rock cuts, careful placement in relation to the Key Observation Points and other techniques have allowed both the construction and production of oil and gas as well as the protection of view sheds.</p> <p>The alternatives provide a range of VRM classification from which management can select</p>	

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				from for the final RMP and the VRM classification within the final RMP will be consistent with general overall management direction.	
State of Utah	G-1	VI42	Appendix K contains a second proposed stipulation concerning the Book Cliffs on page K-10. The stipulation indicates that no surface occupancy or other surface disturbance will be allowed for a distance north of Highway 40 east of the Green River. This area is near Blue Mountain, not really all that close to the Book Cliffs. The state requests clarification of this, and a further description of what "no surface disturbance" means. No livestock? No hiking?	<p>The reason for Blue Mountain being included within the Book Cliffs Planning area is because the boundary for the Book Cliffs Resource Area was defined as those lands both east and south of the Green River. Both "No Surface Disturbance" and "No Surface Occupancy" definitions can be found on in the Glossary.</p> <p>The referenced stipulation is an existing decision from the Book Cliffs RMP, which is the reference to the Book Cliffs. Please note that this stipulation was not carried forward in Alternatives A-C. If carried forward in the final RMP, reference definition of "No Surface Disturbance" in the Glossary.</p>	
State of Utah	G-1	VI43	Because a VRM management class is to be established only after a management decision is made, and the VRM proposed management regime lacks significant analysis and a range of alternatives, the State of Utah requests that a review of all detailed VRM analysis and proposed management decisions be undertaken in cooperation with the state and local government before the FEIS/FRMP is completed.	<p>See comment responses VI1F and VI-36 above.</p> <p>The range of alternatives for VRM classification as shown in Table 2.1.24 (Visual Resource Management) of the PRMP/FEIS does provide a sufficient range of options for VRM designation from low proportions of VRM I and II designations under Alternatives B and D to high proportions of those same designations under Alternatives A and C.</p>	
Bureau of Indian Affairs	G-2	VI25	Under Alternative C, the reduction in short-term adverse impact is recognized but the reduction in long-term beneficial impacts (associated with restrictions on fuel reduction in ACEC's) is not.	<p>Section 4.17.2.12.3 has been revised in the PRMP/FEIS as follows:</p> <p>"Alternative C would have similar impacts as Alternative A, except that up to 552,663 acres of forest and woodlands would be available for treatments or harvesting. Forest and woodland species salvage would be allowed only when the</p>	X

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				woodland or forest resource were threatened, which would reduce the short-term, adverse impacts on visual resources. Excluding woodland salvage within 242,760 acres of proposed ACECs would reduce the long-term beneficial impacts on woodlands because this form of fuel load reduction would not be conducted to reduce the risk of catastrophic wildland fire.”	
Duchesne County	G-9	VI1	It is the position of Duchesne County that RMP's should not apply VRM classifications in such a way as to diminish historically permitted or leased "domestic livestock grazing," "mineral exploration and production," "timber production," and principal and major uses of the land as mandated by FLPMA Section 1702(1).	According to BLM Manual 8400.06(2) Visual Resource Management, VRM classes shall result from, and conform to, the resource allocations made in RMPs. This would include domestic livestock grazing, mineral exploration and production, timber production, etc.	
Duchesne County	G-9	VI1A	VRM classifications and goals must be limited to protecting against only damage that is permanent and irreparable, while recognizing and allowing for overall multiple use and quality of life for local communities (who enjoy the land and who rely on balanced, sustained-yield economic use of natural resources in the planning area) and visitors to public lands [see FLPMA Section 1702(1)].	The purpose of VRM classifications is not tied to protecting permanent and irreparable damage. VRM classifications are assigned to public lands based on scenic quality, sensitivity level, and distance zones. The VRM classification has an objective which prescribes the amount of change allowed in the characteristic landscape. See the Glossary of Terms in BLM Manual 8400.	
Duchesne County	G-9	VI1B	VRM I and II classifications constitute de facto wilderness management in violation of the multiple use mandate of FLPMA, and required by BLM Manual H 8410 and NEPA to impose VRM restrictions.	VRM classifications are not the mechanism for designating wilderness areas. Wilderness Study Areas are managed by their own set of rules and regulations (see BLM Manual H-8550-1, Interim Management Policy and Guidelines for Lands Under Wilderness Review). BLM Handbook 8410-1, Visual Resource Inventory, states in III(5), “Special Areas. Management objectives for special areas such as Natural Areas, Wilderness Areas or Wilderness Study Areas, Wild and Scenic Rivers,	

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				<p>Scenic Areas, Scenic Roads or Trails, and Areas of Critical Environmental Concern (ACEC), frequently require special consideration for the protection of the visual values. This does not necessarily mean that these areas are scenic, but rather than one of the management objectives may be to reserve the natural landscape setting. The management objectives for these areas may be used as a basis for assigning sensitivity levels.”</p> <p>Furthermore, BLM IM-2000-96 (Use of Visual Resource Management Class I Designation in Wilderness Study Areas states:</p> <p>“... that all WSAs should be classified as Class I, and managed according to VRM Class I management objectives until such time as the Congress decides to designate the area as wilderness or release it for other uses. If a WSA is designated as wilderness, the area would continue to be managed as VRM Class I.”</p>	
Duchesne County	G-9	VI1C	<p>VRM analysis should be based on certain visual reference points. For example, analysis should be based on that which is visible from the resource that is intended to be protected. Classifications for VRM should not be "overly broad." All VRM's must be developed based on a specific point of reference such as a river, a stream, a road, etc. RMP's are legally flawed that lack such articulation of existing character and why retention of such is important, a statement of acreage affected, etc..</p>	<p>VRM classifications are made to meet management goals and objectives. Although an inventory may be used, it is not required.</p> <p>The current classifications were brought forward from the Book Cliffs and Diamond Mountain RMPs.</p> <p>H1601-1 – Land Use Planning Handbook, Appendix C, I. Visual Resources states, “Land Use Plan Decisions. Manage visual resource values in accordance with visual resource management</p>	

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				<p>(VRM) objectives (management classes). Designate VRM management classes for all areas of BLM land, based on an inventory of visual resources and management considerations for other land uses. VRM management classes may differ from VRM inventory classes, based on management priorities for land uses (see BLM Handbook H8410-1 for a description of VRM classes).”</p> <p>The commenter is correct in stating that VRM classifications should be prescribed to areas as seen from specific places only. Called “Key Observation Points” (KOP), i.e. a scenic overlook, a frequented canyon rim, or a particular feature, the VRM classification given would be managed to protect that view shed from that point. Another way to protect an area like the White/Green River corridors or a Scenic Byway would be to manage for whatever classification is determined along the entire river corridor. This has been analyzed in the past by projecting a computer generated viewer from 3 feet above the river surface (similar to a canoeist) located in the middle of the waterway and then asking the computer to generate a 360 degree view for the length to be analyzed. The results demonstrate the frequency of sightings, the distance seen, and the areas observed.</p>	
Duchesne County	G-9	VI1D	VRM I rating shall be restricted to Class I wilderness areas, congressionally designated wild and scenic river segments, and other areas where congressional decisions or legitimate administrative decisions have been made to preserve a natural landscape.	VRM Class I can be designated for other areas that are not national wilderness areas, wild and scenic river segments, and other congressionally and administratively designated areas. The language of H-8410-1 states that in areas where the natural landscape is to be maintained includes areas such	

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				<p>as WSAs, wild and scenic rivers, etc. This does not eliminate other naturally scenic areas from designation as VRM I. The BLM can designate other areas as VRM I if the land use objectives for that area deem it important to maintain the natural scenic quality and if the area proposed for VRM I designation possesses scenic quality and natural landscape characteristics. The alternatives present a range of VRM categories from which management can select from.</p>	
Duchesne County	G-9	VI1E	<p>RMP's are contrary to law to the extent they authorize VRM ratings beyond these parameters. VRM I ratings are illegal in WSA's (see BLM IM 2000-96 and BLM H-8550-1). Moreover, a VRM I classification on WSA's conflicts with FLPMA Section 1782(c), which expressly allows for the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in which the same was conducted when FLPMA took effect.</p>	<p>Visual Resource Management in class I and II areas does not preclude oil and gas development, but it does mean that the BLM has to try harder to accommodate both the visual concerns as well as the valid and existing rights. Through screening techniques such as topography, vegetation, coloration, and adaptation of facilities, we have been successful in fully mitigating the visual concerns of some VRM II areas.</p> <p>See comment response SD174 regarding valid existing rights. This would include both mining and grazing uses.</p>	
Duchesne County	G-9	VI1F	<p>Duchesne County has adopted a policy in its General Plan stating, "Imposing VRM classifications that result in the prohibition of formerly valid surface occupying or surface disturbing activities is an improper use of the VRM tool."</p> <p>Based on the above, Duchesne County expresses support of Alternative A, depicted on Figure 29 of the Draft EIS. This alternative contains no Class I VRM in Duchesne County and the only Class II VRM is located</p>	<p>BLM is aware that there are specific County and State Plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. FLPMA requires that the development of resource management planning for public land must be coordinated with and consistent with county plans to the maximum extent possible by law, and resolve to the extent practicable, inconsistencies between federal and non-federal government plans (FLPMA, Title II Sec. 202 (c) (9)).</p>	

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			<p>along Nine Mile Canyon, east of Gate Canyon. Duchesne County opposes Alternatives B, C, and D, which designate more Class II VRM areas in the county.</p>	<p>As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. Thus, while county and federal planning processes, under FLPMA, are required to be as integrated and consistent as practicable, the federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations. BLM will identify these conflicts in the FEIS/Vernal RMP so that the State and local governments have a complete understanding of the impacts of the Vernal RMP on State and local management options. A consistency review of the Vernal RMP with the State and County Master Plans has been included in Chapter 5.</p>	
Duchesne County	G-9	VI25	<p>Under Alternative C, the reduction in short-term adverse impact is recognized but the reduction in long-term beneficial impacts (associated with restrictions on fuel reduction in ACEC's) is not.</p>	<p>Section 4.17.2.12.3 has been revised in the PRMP/FEIS as follows:</p> <p>“Alternative C would have similar impacts as Alternative A, except that up to 552,663 acres of forest and woodlands would be available for treatments or harvesting. Forest and woodland species salvage would be allowed only when the woodland or forest resource were threatened, which would reduce the short-term, adverse impacts on visual resources. Excluding woodland salvage within 242,760 acres of proposed ACECs would reduce the long-term beneficial impacts on woodlands because this form of fuel load reduction would not be conducted to reduce the risk of catastrophic wildland fire.”</p>	X
Daggett County	G-13	VI2	<p>The maximum VRM rating [Daggett County] can see a need for is VRM III. The area you are recommending for VRM I is in view of Taylor Flat Subdivision, which</p>	<p>The alternatives present a range of VRM categories from which management can select.</p>	

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			has 1000 lots that are sold and also in view of the Jarvie Ranch Historical Site.	It should be noted that VRM Class I is associated with Cold Spring Mountain Wilderness Study Area. While it is possible to look from the Taylor Flats Subdivision into this WSA, this would not change the Cold Springs Mountain VRM Classification, nor would it change the classification for the subdivision or the Jarvie Ranch Historical Site.	
Daggett County	G-13	VI3	The Brown's Park area could have mineral development. Utility lines to the Taylor Flat Subdivision, range improvement programs, burning and chaining the pinion and juniper, watering trough's (sic) etc. that would be limited by VRM I designation. VRM I allow (sic) only "very limited management activity" and VRM III would allow more flexibility in management and the view sheds could still be protected and in some cases enhanced.	See comment response VI2.	
USFS—Ashley National Forest	G-19	VI49 (LVI-1)	Mention the Wilderness Acts, High Uintas Wilderness, and Flaming Gorge NRA in this section and affects on visibility to these properties.	The analysis of impacts on visibility in Class I areas is provided in Section 4.2.2.6.7.4 of the PRMP/FEIS.	
UBAOG	G-22	VI10	In extreme SW Duchesne County you will find that BLM land and fee lands there have been assigned VRM Class II (Figure 26). If you compare it to Figure 9 the BLM lands have been assigned category 2 (Timing and control as surface use.) It is questionable that category 2 is consistent with a VRM Class 2 management.	VRM II can be consistent with Timing and Controlled Surface Use when site-specific VRM mitigation is applied (see VRM Manual H-8431-1 for possible design techniques to reduce visual impacts). Figure 26 is a Travel/OHV map. VRM classification starts with Figures 29-32. Figure 9 is a Seasons of Use map for grazing.	
UBAOG	G-22	VI11	In [extreme SW Duchesne County] the BLM holds small tracts within fee lands, some appear to be as small as 40 acres. The value of assigning a VRM class to small tracts of land surrounded by fee lands is	The BLM is required, by policy, to assign VRM inventory and management classes to all BLM-administered public lands during the RMP process.	

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			questionable. This comment would apply where the same situation exists NW of Maeser and in the Diamond Mountain area. In these areas BLM would not be able to control use of the land, thus lacks the ability to control VRMs in the area.	See comment response VI1.	
UBAOG	G-22	VI12	It appears that VRM restrictions on BLM land could be used to restrict acres and ROW to fee lands to restrict their development. If this is the intent it should be analyzed and disclosed.	See comment response VI1.	
UBAOG	G-22	VI13	All proposals for establishing Visual Resource Class should be analyzed. Throughout the matrix there are proposals that in addition to establishing a management restriction or a special designation it is proposed to establish a VRM classification. Here when a management alternative is selected a VRM class is also selected without analysis of need or other VRM classification alternatives.	See comment response V I7A.	
UBAOG	G-22	VI14	The visual resource inventory manual H-8410-1 provides that management decisions are the basis for the assignment of a VRM classification. To insure that the appropriate VRM class is assigned after a management alternative is selected, an analysis of a range of alternatives for that decision should be made.	BLM Manual H-8410-1 states that RMP management decisions are the basis for assigning VRM management classes. That is, the type and intensity of activities permitted within an area will determine the VRM management class. NEPA requires that a range of reasonable alternatives be considered and analyzed (as was done in the Vernal RMP EIS) that are applicable to the Proposed Action and meet the project's Purpose and Need (40 CFR 1502.14).	
UBAOG	G-22	VI15	A review of Figure 26 would indicate that the VRM classifications proposed are based on proposed management alternatives. In most cases the more restrictive ones follow the proposed alternative exactly. This indicates that the Scenic Quality Evaluation in H-8410-1 was not made. H-8410-1 provides in section V.A.1 that class 1 is assigned to those areas where a	Figure 26 is a Travel/OHV map. Maps displaying VRM classification are found in Figures 29-32.	

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			<p>management decision has been made previously to maintain a natural landscape. There are areas in the RMP where VRM class I has been proposed that do not meet this test. In the White River area VRM Class I is proposed that is outside the proposed WSR proposed designation and does not meet this test. Additionally a VRM Class I cannot be assigned to the ACEC or SRMA proposed here as a previous decision to manage it to maintain a natural landscape has not been made, and is inconsistent with direction provided in H8410-1.</p>		
UBAOG	G-22	VI15	<p>Given the fact that the VRM class is to be established after a management decision and that some lack analysis and a range of alternatives, it would seem clear that analysis should take place here.</p>	See comment response VI1C.	
UBAOG	G-22	VI16	<p>In Brown's Park a VRM Class I has been proposed within the expanded SRMA. The VRM Handbook is clear in VA. I that Class I is reserved for areas where a previous decision has been made to manage the area to maintain natural landscapes such as wilderness and WSR (wild). None of the Brown's Park area has been designated to be managed for natural landscape. The nomination of the Green River as WSR is for scenic not wild. Thus the river corridor does not meet the above requirement.</p>	See comment response VI1D.	
UBAOG	G-22	VI17	<p>On Figure 26 the map shows a VRM class I designation for Raven Ridge. A search of the document shows no analysis of need or other alternatives for this designation.</p>	<p>In both alternatives A and C, Raven Ridge is shown as having a VRM II classification. If the area in question is located north of there, then that is the far western extension of the Bull Canyon WSA located primarily in Western Colorado. The WSA is identified as VRM I.</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment response VI15.	
UBAOG	G-22	VI18	A VRM class I clearly would prohibit mineral development and other surface disturbing activities. This designation in effect is withdrawal.	See comment response VI1E.	
UBAOG	G-22	VI18A	In the VRM handbook at V.I it provides that VRM class do not establish management direction and should not be used as a basis for constraining or limiting surface disturbing activities.	See comment response VI14.	
UBAOG	G-22	VI19	The same descriptions should be provided for VRM I, III, IV as for VRM II was.	The Final EIS text has been amended to show descriptions for all VRM Management Classes in Appendix K.	X
UBAOG	G-22	VI20	This section should be rewritten to provide that such action would be permitted if the function of these areas is protected. This then would be consistent with EPCA direction. Strike (B) and (C) as they are not. There is no requirement for development to enhance riparian.	The commenter does not provide additional information nor explain how or why VRM Class objectives would be inconsistent with EPCA. In fact, Section 1.12 specifically points how the EPACA inventory was considered during the preparation of the PRMP/FEIS. BLM policy requires surface disturbances within VRM Class II areas to meet the visual resource management objectives stipulated for that VRM Class. This is stated in Table 2.1.24 (Visual Resource Management) of the PRMP/FEIS.	
UBAOG	G-22	VI21	How can 35,900 acres of mineral withdrawals under Alternative D lead to a higher level of visual protection than 36,267 acres of such withdrawals under the three action alternatives?	Section 4.17.2.3.2 in the PRMP/FEIS has been revised to reflect that Alternatives A, B, C, and E provide more acreage for protection of visual resources that does Alternative D.	X
UBAOG	G-22	VI22	It is not correct to say that Alternative B does not specify management actions on slopes greater than 40%. Table 2.3, Page 2-54, states that an approved, engineered plan is required under Alternative B for surface disturbance on slopes greater than 20% (which should include slopes over 40%).	Section 4.17.2.8 in the PRMP/FEIS has been revised to clarify the statement describing the slope management actions for Alternative B.	X
UBAOG	G-22	VI23	It is not logical that Alternative B would have greater	The text in question has been deleted from Section	X

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			negative OHV impacts on visual quality than Alternative D. Alternative B has much fewer acres open to unrestricted OHV use and both of these alternatives maintain existing roads if they continue to serve a public purpose.	4.17.2.7.4 of the PRMP/FEIS.	
UBAOG	G-22	VI24	In the analysis of Alternative B, the long-term beneficial visual impacts associated with woodland forest management are not recognized.	Section 4.17.2.12.2 has been revised in the PRMP/FEIS as follows: "The long-term beneficial impacts on woodlands would be similar to those discussed under Alternative A."	X
UBAOG	G-22	VI5	The RMP misuses visual resource management areas and most of the Class II areas should be changed to Class III or IV.	The commenter does not provide any reasons as to why VRM II class areas should be changed to VRM III or IV.	
UBAOG	G-22	VI5A	While FLPMA expresses a policy to protect scenic quality, there is no other direction. The FLPMA policies cannot be implemented absent such direction.	FLPMA and BLM policy require that the RMP process review visual resources within the VFO in order to protect scenic quality. VRM II areas were designated as such, based on BLM VRM inventories, proposed management actions for the area.	
UBAOG	G-22	VI6	The RMP assumes that visual quality by itself is a major multiple use when FLPMA does not authorize this assumption. Even more significantly, the RMP claims to preserve "scenic vistas" which are areas far outside what is actually being proposed.	Comment noted.	
UBAOG	G-22	VI7	The proposed VRM I classification in the western portion of the proposed White River SRMA and in the Browns Park area is improper. The amount of acreage subject to the VRM is not specified, making it totally improper in this draft EIS.	There are no VRM classifications proposed in the Browns Park or White River SRMAs and none are indicated in Table 2.1.14 (Recreation – Special Recreation Management Areas (SRMAs)) of the PRMP/FEIS.	
UBAOG	G-22	VI7A	The RMP contains no evidence that the necessary groundwork has been done as required by BLM Manual H-8410 to explain or justify this classification.	An interdisciplinary team reviewed the existing VRM inventory to identify proposed VRM objectives, Classes I – IV, and how they relate to the	

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			<p>H-8410 section V restricts Class I classifications, wilderness areas, congressionally designated wild and scenic river segments, and other areas where congressional decisions or legitimate administrative decisions have been made to preserve a natural landscape. No such congressional decision and no such legitimate administrative decision has been made here. BLM may not use the VRM I tool in an attempt to effect a non-impairment management standard. To do so would violate the multiple use sustained yield mandate of FLPMA.</p>	<p>management objectives for each alternative. A wide range of alternatives is included and analyzed in the RMP. Visual resources are analyzed in each alternative along with the other resources.</p> <p>The inventory followed the procedures and is in compliance with the guidelines established in BLM Manual Handbook H-8410-1 Visual Resource Inventory as well as BLM Manual Handbook 8431-1 Visual Resource Contrast Rating.</p>	
UBAOG	G-22	VI7B	<p>The White River and Brown's Park SRMA language should be amended to eliminate the Class I VRM which purports to exclude legitimate surface activities in a high mineral potential previously leased area over which a number of RS 2477 county roads run.</p>	<p>BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
UBAOG	G-22	VI7C	<p>To use the VRM I tool to eliminate legitimate surface activities in the name of managing for the naturalness of the area, is to return to the old policies of managing WIA's, citizens proposed lands and the like, under a non-impairment standard, all of which were outlawed in the Settlement Agreement.</p>	<p>See comment response VI1E.</p>	
UBAOG	G-22	VI8	<p>The RMP is defective to the extent it relies on a VRM II Classification to eliminate surface disturbing activities</p>	<p>While BLM manual H-8410-1 provides guidance and criteria for inventorying the visual quality of an</p>	

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			<p>at all, let alone on over a half mile of land either side of the eastern portion of the proposed White River SRMA. Manual H-8410-1 at section V.B.2. states the Class II objective allows that management activities to be seen as long as they do not attract the attention of the casual observer. Given this criteria, the BLM's use of VRM II label as a means to bar all surface activities up to one half mile on either side of this eastern segment of the White River area is arbitrary and wholly unjustified, given the utter lack of analysis and rationale expressed in the RMP. The RMP fails to justify or even attempt to explain why the proposed White River SRMA has to extend wider than the existing White River recreational corridor.</p>	<p>existing landscape, it is management's calculated decision based on FLPMA's policy to protect the scenic qualities as well as other resource issues which determine the amount of latitude they wish to manage for. The half- mile corridor is a tool which management has determined to be a reasonable distance to protect the naturalness and/or the VRM classification objectives for that area.</p> <p>The alternatives present a range of VRM categories from which management can select from.</p> <p>NOTE: H-8410-1 is a handbook, not a manual. Manuals provide policy direction; handbooks provide guidance.</p>	
UBAOG	G-22	VI9	<p>All reference to VRM in this RMP are lacking in detail to enable the reader to fully analyze the impacts of such designations.</p>	<p>Analysis of impacts on visual resources from land management decisions are provided in Section 4.17. The analyses of visual resource management decisions on other resources and land uses are provided within each resource section throughout Chapter 4.</p>	
<p>Uintah, Daggett, and Duchesne Counties</p>	G-23	VI33	<p>The VRM I proposed for primitive recreation values is not shown on map 29. A shape file recently received from the BLM indicates that this is an area on the south side of the river and appears to be the entire north slope of the mountains that make up the visual barrier when looking south from the river. The majority of the area proposed as a VRM I are within full view of the Taylor Flats subdivision and in some cases less than a mile from it. The area is also within sight and sound of recreational activities, and vehicle traffic along the river and residential activity on Taylor Flats, which has been divided into one thousand lots. The existing uses of</p>	<p>The West Cold Springs and the Diamond Breaks WSAs are protected by VRM class 1. This is not associated with the Taylor Flat area.</p>	

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			[the area's classified as VRM I], and the fact the area receives very little recreational use, demonstrates poor analysis of need and planning for this proposal and should be struck from all alternatives.		
Uintah, Daggett, and Duchesne Counties	G-23	VI34	As with other VRM classes proposed in the area, a VRM I here would prevent needed wildlife habitat improvement in an area BLM has proposed to protect crucial habitats.	See comment response SD99.	
Uintah, Daggett, and Duchesne Counties	G-23	VI35	The proposal to establish a VRM I here is counter to direction provided in BLM's VRM handbook which provides that a VRM I is only to be applied where previous management decisions have been made to manage an area for it's natural landscapes such as wilderness areas. A VRM I has also been applied to the two WSA's in the area. These are inappropriate as they are inconsistent with provisions of the IMP, which guide management of WSA's. There are uses allowed in the IMP that would be prohibited under a VRM I.	See comment response VI1D	
Uintah, Daggett, and Duchesne Counties	G-23	VI36	In all alternatives this area is to be managed as a VRM II. Neither the DEIS/RMP nor the AMS justifies the need for change from the VRM III and VRM IV that is currently applied to the area. The condition of the area at this time would support that the current VRM III and VRM IV adequately protect the area.	BLM visual inventories use scenic quality and visual sensitivity to evaluate the visual resource condition of an area. As described in BLM Handbook H-8410-1 Visual Resource Inventory, a more protective VRM Class may be assigned to an area if the VRM inventory process determines that an area has become more visually sensitive and management decisions have been made to preserve or maintain the area's landscape and scenic quality. See comment response VI14.	
Uintah, Daggett, and Duchesne	G-23	VI37	A VRM II applied to this area is inconsistent with existing developments and uses within the area and ignores the existence of road and utility corridor that	This statement merely refers to the fact that the BLM does not have the authority to impose restrictions on non-Bureau landholders within areas	

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Counties			crosses it. Much of the area is private or state land, which BLM does not control. There is a strong possibility that private property rights would be impacted. There is a possibility on need for holders of water rights to develop those rights or to construct or reconstruct diversions for those rights; in many cases a VRM I or II could impact those rights.	that contain VRM I or II designation, nor does it have the authority to usurp legal water rights.	
Uintah, Daggett, and Duchesne Counties	G-25	VI26	We are concerned about the lack of real discussion in the Draft EIS about the management of visual resources. The proposed management prescriptions laid out on page 2-62 do nothing more than indicate the aggregate amount of acreage to be managed in each VRM management class. The management "common to all" discussion on page 2-36 indicates only, in one simple sentence, that the objectives for each specific visual resource management class, outlined in BLM Handbook H-8410-1, and repeated on page J-3, would be implemented.	Table 2.1.24 (Visual Resource Management) of the PRMP/FEIS Section 2.4.16.1 identifies the Goals and Objectives for visual resource management. Section 3.17 provides a discussion of the affected environment regarding visual resources. Section 4.17 provides a discussion of the environmental consequences for visual resources.	
Uintah, Daggett, and Duchesne Counties	G-25	VI27	We are concerned about the apparent lack of an updated visual inventory. This ties in with the rationale for the "Sensitivity Level Analysis" required by BLM Manual Handbook H-8410-1.III.A. - Factors to Consider. Many of these factors change over time, and a simple rollover of an older inventory would not accurately reflect these adjustments. In addition, the lack of updated inventory information makes interpretation of the differences between the inventory and management classes impossible to determine. The draft RMP needs to fully explain how the visual inventory was accomplished, so that differences in visual management prescriptions proposed in the various Alternatives may be compared to the inventory classes. This indicates to the reader exactly how the VRM management classes are assisting in the resource management goals of each Alternative.	<p>See comment response VI7A.</p> <p>Some major travel corridors were elevated in their visual sensitivity, (which is one of the criteria in visual sensitivity rating), because of the increase in use and visitation. Two areas were re-inventoried because of both the dramatic increase in oil and gas activity and the perceived increase of both user numbers and attitude perception toward natural landscapes. As a result of the re-inventories, both areas were elevated in VRM rating as seen in Figures 29 and 32 which are reflected in Alternatives A and D respectively.</p> <p>The alternatives provide a range of VRM</p>	

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				classification from which management can select from for the final RMP and the VRM classification within the final RMP will be consistent with general overall management direction.	
Uintah, Daggett, and Duchesne Counties	G-25	VI28	The maps on Figures 29-32 are hard to interpret concerning the VRM management classes, as the figures are not specific enough to determine the exact geographic location of most of the boundary lines. Because of this, the counties cannot determine if the criteria for VRM inventory have been correctly followed, and exactly where, on-the-ground, the BLM proposes to change management from one class to another, except for certain geographical areas which fully correspond to other proposed management designations.	The BLM acknowledges that the scale of Figures 29-32 may not provide sufficient detail to delineate VRM boundary lines for the various classifications; however, electronic files are well defined and provide sufficient detail.	
Uintah, Daggett, and Duchesne Counties	G-25	VI29	The draft RMP purports to discuss the impacts of various resource management decisions on visual resources, but, in actuality, this discussion is either misleading or circular and non-responsive. As an example of a misleading statement, the discussion of VRM resources on pages 3-117 to 3-118 lays out the management criteria and requirements for the four VRM management classes. The discussion indicates that currently the only areas in the VFO managed as VRM management class I are Wilderness Study Areas, and one WSA equivalent, an Instant Study Area. It continues by stating that minerals exploration and development “is not presently exceeding VRM class objectives” throughout the Vernal Field Office, due to proper visual mitigation methods. Yet on page 4-122 the document indicates that VRM management classes I and II “allow little or no alteration to the line, form, color and texture that characterize the existing landscape,” thereby raising the potential for greater impacts to minerals development. On page 4-123, the	Minerals exploration and development are presently occurring in areas not designated has high VRM classes but in areas of lower VRM classification (Class IV to be specific—see Figure 32), where greater levels of visual intrusion are tolerated. Smaller areas are designated as VRM Class III and Class II, wherein slightly higher restrictions on visual alteration exist and visual mitigation measures are used. As such, the DEIS statements referenced in the document are not contradictory. Under Alternatives A and C, changes in VRM classification across the VFO would increase the number of acres under Class I and II designation (with more VRM Class I under Alternative C than A). More of these VRM Class I and II areas would overlap with areas desirable for minerals and energy exploration and development. As such, under these alternatives, there would be greater impacts on minerals and energy development through increased restrictions related to visual resources management.	

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			analysis clearly states that an increase in the number of acres of VRM Classes I and II would lead to a direct decrease in the number of available well locations, thereby leading to less production (and royalties). We ask for clarification of the correct standards for VRM management in the VFO, and that the VFO analyze VRM I and II designations as a possible withdrawal of the mineral resources.		
Uintah, Daggett, and Duchesne Counties	G-25	VI30	We are concerned that the draft RMP is not specific about the sources and goals of many of the special management designations available to it, leading to circular and non-responsive reasoning in the analysis. For example on page 4-284 the impacts analysis for visual resources and special designations indicates that visual resources will be protected by designation of ACECs and Wild and Scenic River designations. This analysis proceeds under the general presumption that ACECs and WSR segments are “good” for visual resources, but fails to indicate the management prescriptions which actually accomplish this goal.	Table 2.1.18 (Special Designations – Areas of Critical Environmental Concern (ACECs)) of the PRMP/FEIS provides information about the management foci for each proposed ACEC or special designation. Many of these foci, such as controlling noxious weeds, limiting OHV use to designated routes, and establishing controlled surface use stipulations on minerals and energy exploration and development would reduce visual intrusions and alteration of the landscape. Such an outcome would be beneficial to the preservation of visual resources. Also, designation under the Wild and Scenic Rivers Act and through the ACEC process confers a level of resource management that protects and preserves the important and relevant values of an area from the potential effects of actions that would otherwise be permitted by the RMP. In general, emphasis is given to protecting the aesthetic, scenic, wildlife, historic, archaeological, unique or distinctive, and/or scientific features of these areas.	
Uintah, Daggett, and Duchesne Counties	G-25	VI31	Which designation - ACEC, WSR, SRMA or VRM management - is being proposed for the protection of visual resources? The VRM discussion mentions the others, while the ACEC discussion mentions the use of VRM classifications. This lack of clarity in proposed management prescriptions doesn't meet the	Visual resources benefit from a variety of different special management designations, not just VRM classification. While VRM classification is specific to visual resources, ACEC, WSR, and SRMA designation can also consider visual resource values, and the management goals of such	

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			<p>requirements of full disclosure under the provisions of NEPA, and doesn't allow us to determine whether or not the BLM is proposing duplicate prescriptions, contrary to the provisions of state law, and the BLM's Manual on designation of ACECs.</p>	<p>designations typically include actions that afford protection to visual resources as an ancillary benefit.</p> <p>Overlapping of program decisions is not optional for BLM, but is required by the FLPMA, 1976 and National BLM planning and program specific regulations. The FLPMA directed that management of public lands be 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. For example, 43 CFR Group 2500 provides guidance and requirements for Disposition; Occupancy and Use of public lands; Group 2800 for Rights-of-way; Group 3400 for Coal Management; Group 6000 for Designated Wilderness, and Group 8200 for Natural History, part 8351 for Wild and Scenic Rivers. Multiple-use management requires a balancing of the mandates for these separate programs.</p> <p>BLM's Land Use Planning Handbook requires that specific decisions be made for each resource and use (Appendix C, H-1601-1). The required decisions must be included in each of the alternatives analyzed during development of the RMP. The RMP will include the decisions required for each program.</p> <p>See comment response VI29.</p>	
<p>Uintah, Daggett, and Duchesne Counties</p>	<p>G-25</p>	<p>VI32</p>	<p>The counties and State of Utah cannot support any proposed VRM class management specifications that will prevent habitat enhancement, fuels reduction, and prescribed fire activities from occurring in the VFO.</p>	<p>The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is</p>	

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			<p>The RMP must choose VRM management classes which allow vegetation and habitat treatments that improve wildlife habitat and reduce the likelihood of catastrophic fire events.</p>	<p>bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolved to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p> <p>Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.</p> <p>See also comment response VI1. No VRM classification precludes limited management actions, which may include fuels reductions, prescribed fire, and/or habitat enhancements. VRM Class I and II require that these management activities be conducted in ways that have minimal impact on visual resources over the long term.</p>	
<p>Uintah, Daggett, and Duchesne</p>	<p>G-25</p>	<p>VI58 (PR11)</p>	<p>Some of the proposed VRM boundaries follow the boundaries of old Wilderness Inventory Areas, causing the concern that these provisions for VRM</p>	<p>This is the same comment as VI39.</p>	

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Counties			management are substitutes for non-use or non-impairment standards, in contradiction to State law and the case of Utah v. Norton.		
Uintah, Daggett, and Duchesne Counties	G-25	VI59 (PR12)	Because a VRM management class is to be established only after a management decision is made, and the VRM proposed management regime lacks significant analysis and a range of alternatives, the counties request that a review of all detailed VRM analysis and proposed management decisions be undertaken in cooperation with the state and local government before the Final EIS and RMP is completed.	This is the same comment as VI 43.	
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.	
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.	
Utah Farm Bureau Federation	O-9	VI21	How can 35,900 acres of mineral withdrawals under Alternative D lead to a higher level of visual protection than 36,267 acres of such withdrawals under the three action alternatives?	Section 4.17.2.3.2 in the PRMP/FEIS has been revised to reflect that Alternatives A, B, C, and E provide more acreage for protection of visual resources that does Alternative D.	X
Utah Farm Bureau	O-9	VI22	It is not correct to say that Alternative B does not specify management actions on slopes greater than 40%. Table 2.3, Page 2-54, states that an approved,	Section 4.17.2.8 in the PRMP/FEIS has been revised to clarify the statement describing the slope	X

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Federation			engineered plan is required under Alternative B for surface disturbance on slopes greater than 20% (which should include slopes over 40%).	management actions for Alternative B.	
Utah Farm Bureau Federation	O-9	VI23	It is not logical that Alternative B would have greater negative OHV impacts on visual quality than Alternative D. Alternative B has much fewer acres open to unrestricted OHV use and both of these alternatives maintain existing roads if they continue to serve a public purpose.	The text in question has been deleted from Section 4.17.2.7.4 of the PRMP/FEIS.	X
Duchesne County Water Conservancy District	O-10	VI1	It is the position of Duchesne County that RMP's should not apply VRM classifications in such a way as to diminish historically permitted or leased "domestic livestock grazing," "mineral exploration and production," "timber production," and principal and major uses of the land as mandated by FLPMA Section 1702(1).	According to BLM Manual 8400.06(2) Visual Resource Management, VRM classes shall result from, and conform to, the resource allocations made in RMPs. This would include domestic livestock grazing, mineral exploration and production, timber production, etc.	
Duchesne County Water Conservancy District	O-10	VI1A	VRM classifications and goals must be limited to protecting against only damage that is permanent and irreparable, while recognizing and allowing for overall multiple use and quality of life for local communities (who enjoy the land and who rely on balanced, sustained-yield economic use of natural resources in the planning area) and visitors to public lands [see FLPMA Section 1702(1)].	The purpose of VRM classifications is not tied to protecting permanent and irreparable damage. VRM classifications are assigned to public lands based on scenic quality, sensitivity level, and distance zones. The VRM classification has an objective which prescribes the amount of change allowed in the characteristic landscape. See the Glossary of Terms in BLM Manual 8400.	
Duchesne County Water Conservancy District	O-10	VI1B	VRM I and II classifications constitute de facto wilderness management in violation of the multiple use mandate of FLPMA, and required by BLM Manual H 8410 and NEPA to impose VRM restrictions.	VRM classifications are not the mechanism for designating wilderness areas. Wilderness Study Areas are managed by their own set of rules and regulations (see BLM Manual H-8550-1, Interim Management Policy and Guidelines for Lands Under Wilderness Review). BLM Handbook 8410-1, Visual Resource Inventory, states in III(5), "Special Areas. Management objectives for special	

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				<p>areas such as Natural Areas, Wilderness Areas or Wilderness Study Areas, Wild and Scenic Rivers, Scenic Areas, Scenic Roads or Trails, and Areas of Critical Environmental Concern (ACEC), frequently require special consideration for the protection of the visual values. This does not necessarily mean that these areas are scenic, but rather than one of the management objectives may be to reserve the natural landscape setting. The management objectives for these areas may be used as a basis for assigning sensitivity levels.”</p> <p>Furthermore, BLM IM-2000-96 (Use of Visual Resource Management Class I Designation in Wilderness Study Areas states:</p> <p>“... that all WSAs should be classified as Class I, and managed according to VRM Class I management objectives until such time as the Congress decides to designate the area as wilderness or release it for other uses. If a WSA is designated as wilderness, the area would continue to be managed as VRM Class I.”</p>	
Duchesne County Water Conservancy District	O-10	VI1C	VRM analysis should be based on certain visual reference points. For example, analysis should be based on that which is visible from the resource that is intended to be protected. Classifications for VRM should not be "overly broad." All VRM's must be developed based on a specific point of reference such as a river, a stream, a road, etc. RMP's are legally flawed that lack such articulation of existing character and why retention of such is important, a statement of acreage affected, etc..	<p>VRM classifications are made to meet management goals and objectives. Although an inventory may be used, it is not required.</p> <p>The current classifications were brought forward from the Book Cliffs and Diamond Mountain RMPs.</p> <p>H1601-1 – Land Use Planning Handbook, Appendix C, I. Visual Resources states, “Land Use Plan</p>	

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				<p>Decisions. Manage visual resource values in accordance with visual resource management (VRM) objectives (management classes). Designate VRM management classes for all areas of BLM land, based on an inventory of visual resources and management considerations for other land uses. VRM management classes may differ from VRM inventory classes, based on management priorities for land uses (see BLM Handbook H8410-1 for a description of VRM classes).”</p> <p>The commenter is correct in stating that VRM classifications should be prescribed to areas as seen from specific places only. Called “Key Observation Points” (KOP), i.e. a scenic overlook, a frequented canyon rim, or a particular feature, the VRM classification given would be managed to protect that view shed from that point. Another way to protect an area like the White/Green River corridors or a Scenic Byway would be to manage for whatever classification is determined along the entire river corridor. This has been analyzed in the past by projecting a computer generated viewer from 3 feet above the river surface (similar to a canoeist) located in the middle of the waterway and then asking the computer to generate a 360 degree view for the length to be analyzed. The results demonstrate the frequency of sightings, the distance seen, and the areas observed.</p>	
Duchesne County Water Conservancy District	O-10	VI1D	VRM I rating shall be restricted to Class I wilderness areas, congressionally designated wild and scenic river segments, and other areas where congressional decisions or legitimate administrative decisions have	VRM Class I can be designated for other areas that are not national wilderness areas, wild and scenic river segments, and other congressionally and administratively designated areas. The language of	

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			been made to preserve a natural landscape.	H-8410-1 states that in areas where the natural landscape is to be maintained includes areas such as WSAs, wild and scenic rivers, etc. This does not eliminate other naturally scenic areas from designation as VRM I. The BLM can designate other areas as VRM I if the land use objectives for that area deem it important to maintain the natural scenic quality and if the area proposed for VRM I designation possesses scenic quality and natural landscape characteristics. The alternatives present a range of VRM categories from which management can select from.	
Duchesne County Water Conservancy District	O-10	VI1E	RMP's are contrary to law to the extent they authorize VRM ratings beyond these parameters. VRM I ratings are illegal in WSA's (see BLM IM 2000-96 and BLM H-8550-1). Moreover, a VRM I classification on WSA's conflicts with FLPMA Section 1782(c), which expressly allows for the continuation of existing mining and grazing uses and mineral leasing in the manner and degree in which the same was conducted when FLPMA took effect.	<p>Visual Resource Management in class I and II areas does not preclude oil and gas development, but it does mean that the BLM has to try harder to accommodate both the visual concerns as well as the valid and existing rights. Through screening techniques such as topography, vegetation, coloration, and adaptation of facilities, we have been successful in fully mitigating the visual concerns of some VRM II areas.</p> <p>See comment response SD174 regarding valid existing rights. This would include both mining and grazing uses.</p>	
Duchesne County Water Conservancy District	O-10	VI1F	<p>Duchesne County has adopted a policy in its General Plan stating, "Imposing VRM classifications that result in the prohibition of formerly valid surface occupying or surface disturbing activities is an improper use of the VRM tool."</p> <p>Based on the above, Duchesne County expresses support of Alternative A, depicted on Figure 29 of the</p>	BLM is aware that there are specific County and State Plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, BLM is bound by Federal law. FLPMA requires that the development of resource management planning for public land must be coordinated with and consistent with county plans to the maximum extent possible by law, and resolve to the extent practicable,	

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			<p>Draft EIS. This alternative contains no Class I VRM in Duchesne County and the only Class II VRM is located along Nine Mile Canyon, east of Gate Canyon. Duchesne County opposes Alternatives B, C, and D, which designate more Class II VRM areas in the county.</p>	<p>inconsistencies between federal and non-federal government plans (FLPMA, Title II Sec. 202 (c) (9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled. Thus, while county and federal planning processes, under FLPMA, are required to be as integrated and consistent as practicable, the federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations. BLM will identify these conflicts in the FEIS/Vernal RMP so that the State and local governments have a complete understanding of the impacts of the Vernal RMP on State and local management options. A consistency review of the Vernal RMP with the State and County Master Plans has been included in Chapter 5.</p>	
EOG Resources	O-17	VI44 (VI-A)	<p>Assigning VRM Class I, essentially a NSO stipulation to an area that is greater than ½-mile wide corridor [along wild and scenic rivers] and an area under which essential oil and gas resources will not be recovered is not acceptable minerals/oil and gas management on the part of the BLM.</p>	<p>The segment of the White River between Asphalt Wash to where the river leaves Section 18 T10S R23E SLBM has been given the tentative classification of “wild” under Alternative C on Table 2.1.20 (Special Designations – Wild and Scenic Rivers) of the PRMP/FEIS.</p> <p>According to BLM Manual HB 8510-1, Section V.A.1. Visual Resource Inventory Classes:</p> <p>“Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape. This includes areas such as national wilderness areas. The wild section of national wild and scenic rivers and other congressionally and administratively designated areas where decisions have been made to preserve</p>	

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				a natural landscape.”	
EOG Resources	O-17	VI45 (VI-B)	The analysis on these pages is even less clear with management proposed as VRM Class I, II, III, or IV. NSO would be the same as for Alt A, but areas beyond the 1/2 mile buffer for NSO would be open to leasing subject to standard lease terms and managed w/ timing and controlled surface use or closed to oil and gas leasing.	See comment responses VI4 and VI17A. The alternatives provide a range of VRM classification from which management can select from for the final RMP and the VRM classification within the final RMP will be consistent with general overall management direction.	
Cliffs Mining Services Company	O-25	VI48 (VI-E)	We have concerns about restrictions related to VRM classification, noise and traffic; all factors related in some way to resource utilization. This resource management plan must again recognize that mineral development is a major part of balanced land use and provide methods for allowing such factors to coexist with visual, cultural and recreational resources.	Section 3.8 and its subsections discuss the magnitude of minerals and energy exploration and development within the planning area. Such exploration and development are extensively provided for under all alternatives. FLMPA mandates the consideration of multiple uses on public lands; however, it does not mandate that all uses must be allowed in all areas and at all times. Surface occupancy restrictions and requirements for use of best available technology have been included in at varying levels in management prescriptions under the different resource programs within the planning area only in areas where necessary and appropriate to allow minerals and energy exploration to coexist with other resource values and land uses.	
Vermillion Ranch Limited Partnership	O-33	VI50 (R-VI1)	The RMP misuses VRM classes and most of the Class II areas should be changed to Class III or IV. There is little evidence that the RMP complies with procedures in DM 8431 or H-8410-1. The maps support this conclusion since VRM Classes I and II apply to large areas that are lumped.	See comment response VI7A.	
Vermillion Ranch	O-33	VI50A	While FLPMA expresses a policy to protect scenic quality, there is no other direction or authority that	H1601-1 – Land Use Planning Handbook, Appendix	

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Limited Partnership			allows BLM to make this an independent resource use or management imperative. FLPMA policies cannot be implemented absent such direction. 43 U.S.C. §1702(g).	C, I. Visual Resources states: “Land Use Plan Decisions. Manage visual resource values in accordance with visual resource management (VRM) objectives (management classes). Designate VRM management classes for all areas of BLM land, based on an inventory of visual resources and management considerations for other land uses. VRM management classes may differ from VRM inventory classes, based on management priorities for land uses (see BLM Handbook H8410-1 for a description of VRM classes).”	
Vermillion Ranch Limited Partnership	O-33	VI51 (R-VI2)	Delete the following from this section: “Manage the public lands in such a way as to preserve those scenic vistas, which are deemed to be most important: • in their impact on the quality of life for residents and communities in the areas; • in their contribution to the quality of recreational visitor experiences; and • in supporting the regional tourism industry and segments of the local economy dependent on public land resources.”	BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VI51A	Visual quality in FLPMA is only a policy and cannot be implemented as a plan objective. FLPMA does not authorize BLM to implement a policy unless there is specific statutory authority elsewhere in FLPMA or another law. 43 U.S.C. §1702(b). The RMP would	FLPMA, Sections 102(a)(8), 103(c), 201(a), and 205(a) all direct federal land managers to consider and implement management prescriptions that take into account the scenic values of lands under their jurisdiction. FLPMA grants the BLM broad	

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			<p>preserve "scenic vistas" which exceed the areas being used or entitled to protection. BLM cannot rely on other laws, such as the National Historic Preservation Act, 16 U.S.C. §§470-470b; or the Archeological Resources Protection Act, 16 U.S.C. §§470aa-470mm, since neither law authorizes protection of an experience, nor does it authorize protection outside of the cultural site itself.</p>	<p>discretionary authority to manage its lands and does not state that management prescriptions can only be implemented in the presence of other federal legislation. Rather, such prescriptions must not contradict or conflict with other federal legislation. Further, the NEPA, Sections 101(b) and 102, also directs federal land managers to consider measures that will account for scenic values.</p> <p>See comment response CR42 regarding the consideration of setting and feeling with regards to cultural resource sites.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>VI52 (R-VI3)</p>	<p>Federal law protects cultural resources from physical destruction, not the adjacent viewshed. Previous efforts of federal agencies to establish viewsheds have been set aside. Sokol v. Kennedy, 210 F.3d 876 (8th Cir. 2000) (setting aside National Park Service scenic river boundary as too broad and outside the authority in the Wild and Scenic Rivers Act). Similarly, a federal agency cannot extend viewshed protection to limit private or state land uses. United States v. County Bd. of Arlington County, 487 F. Supp. 137, 143 (D. Va. 1979) (setting aside land use restrictions adopted to protect visitors views from National Capitol).</p>	<p>See comment response CR42.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>VI53 (R-VI4)</p>	<p>RE: Alternative A: Strike the reference to specific acres to be managed as VRM Class I and II under Alternative A.</p>	<p>BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantially contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the</p>	

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				<p>current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	VI53A	<p>RE: Alternatives A and D:</p> <p>The RMP designates much of the planning area as VRM Class II without justifying the classification and without clarifying the impact on existing operations. Much of the VRM Class II is grazed by livestock. The RMP needs to specify that livestock grazing activities and related infrastructure will not be constrained. For instance, vegetation treatments, while temporary, do have significant visual effects. The RMP would prohibit such treatments in ½ million acres. If the RMP used the handbook criteria, there would be no basis to double the amount of land in Class II.</p>	See comment responses VI1 and VI14.	
Vermillion Ranch Limited Partnership	O-33	VI54 (R-VI5)	<p>Alternative A: Strike the statement that reads:</p> <p>“Elimination of grazing in the Nine Mile Acquired Area would preserve scenic quality of riparian areas.”</p>	<p>BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the</p>	

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				adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	VI54A (R-VI5)	BLM has limited authority to “eliminate” livestock grazing. It is inaccurate to say that livestock grazing adversely affects visual quality. Also, the RMP shows bias against livestock grazing by classifying it as harming visual qualities while ignoring other grazing animals.	The alternatives present a range of VRM categories from which management can select. See comment response LG46.	
Vermillion Ranch Limited Partnership	O-33	VI54B	Alternative D: Strike the statement: “Unlimited grazing in the Nine Mile Acquired Area would diminish scenic quality.” There is no such thing as “unlimited grazing.”	BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS. The alternatives present a range of VRM categories from which management can select.	
Vermillion Ranch Limited Partnership	O-33	VI55 (R-VI6)	Alternative A—Add the following statement to the section that begins with “Asphalt Wash would”...: “Structural range improvements and vegetation treatments will be allowed notwithstanding VRM class.”	BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion.	

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				<p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	VI55A	<p>The RMP should expressly allow range improvements, including structures and vegetation treatments in VRM I and VRM II areas. As written, the RMP is not clear. The literal application of these classes would prohibit all vegetation treatments, even if they were intended for wildlife. The failure to allow such improvements conflicts with the BLM mandate that all rangelands meet or make progress towards meeting health standards. 43 C.F.R. §4180.1, 4180.2; H-4180-1.</p> <p>Alternative B—The White River Corridor and Book Cliffs areas do not qualify for management as VRM I and the RMP fails to document the basis for VRM Class II. While a corridor along the river itself may meet Class II, the entire area does not.</p>	<p>Please see comment response VI1.</p> <p>The pages to which the comment refers are part of Table 2.5 which summarizes impacts of management decisions from elsewhere in Chapter 2, including Table 2.3. Table 2.5 does not contain management prescriptions but only a summary of impacts to them. No VRM classification precludes vegetation treatments or range improvements. VRM Class I and II designation place greater restrictions on how such actions may be undertaken but do not prevent them.</p> <p>Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 of the PRMP/FEIS.</p> <p>Also, the specific limits that the VRM Class objectives could place on vegetation treatments are beyond the scope of the RMP programmatic EIS. The impacts of site-specific vegetation treatments and mitigation would be analyzed at the project level under site-specific analyses through other NEPA processes and documents.</p>	
Vermillion Ranch	O-33	VI56	Modify the following statement as indicated by bolded additions:	BLM declines to make the suggested wording changes for a variety of reasons including but not	

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Limited Partnership		(R-RE4)	<p>“Alternative A would increase the current acreage of VRM Classes I and II by 227,187 acres to a total of 513,644 acres. This increase would have long-term beneficial effect on some types of recreation throughout the VPA, when compared with Alternative D—No Action. It would, however, negatively affect OHV recreation uses.”</p>	<p>limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	VI56A	<p>The RMP fails to address the fact that much of the recreation is OHV and VRM class expansion will negatively affect this class of recreation.</p>	<p>OHV travel is impacted by route designation and designation of open and closed areas. These designations are only partially tied to VRM classification; all resource programs were considered when making travel designations under each alternative. As such, the impacts to OHV use are discussed in Section 4.10.2.8 as a consequence of Travel decisions on Recreation.</p>	
Vermillion Ranch Limited Partnership	O-33	VI57 (R-RE5)	<p>“4.10.2.9.2 Impacts of Visual Resource Management Decisions on Recreation, Alternative B and D – No Action”</p> <p>Overall, the RMP does a poor job of justifying and documenting the increases in VRM Classes I and II. VRM Class I is limited to designated wilderness, of which there is none in the VPA. VRM Class II is almost doubled without any resource management basis to do so.</p>	<p>See comment response VI1, VI1D, and VI14.</p>	
Vermillion Ranch Limited	O-33	VI60	<p>The RMP fails to disclose the limits the VRM classes will place on vegetation treatments and range improvement projects. If the classes will not limit these</p>	<p>See comment response VI55A. In addition, Section 4.17.3 of the PRMP/FEIS</p>	

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Partnership			activities, the RMP needs to specifically allow them.	states: "All surface-disturbing activities, regardless of alternatives or management action, would be subject to the VRM class objectives of the area within which the activity takes place."	

Wildlife and Fisheries

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State of Utah	G-1	WF100	Placement of Rocky Mountain bighorn sheep in the White River drainage would cause undue conflict with domestic sheep operations and would be harmful to the bighorn sheep. If domestic sheep were prohibited from the area to accommodate the bighorn sheep, TLA would lose a revenue source. Since cattle would not be an appropriate livestock kind for most of these allotments, a switch in livestock kind would not be available to make up for the loss. Compensation may be required if this occurs.	BLM management decisions do not apply to state trust lands.	
State of Utah	G-1	WF101	In this paragraph, the demand for forage resources is equated to the total average actual use. This is erroneous. The "Actual use" numbers more accurately reflect current climatic trends and what was allowed by BLM range staff, nor the demand for forage. During the 10-year period of which this paragraph refers, 5 of these had severe drought conditions and livestock operators were often not allowed to turn out onto the range. For many other reasons permittees are occasionally not allowed to take full use of permitted AUMs, thus, the actual use does not reflect demand for forage. Each year TLA staff have many requests by BLM permittees looking for forage because BLM staff had denied the operator full use of their permits.	Comment noted.	
State of Utah	G-1	WF70	The RMP does not apply enough focus on meaningful mitigation for habitat loss. The seasonal closures and other stipulations proposed for minerals development are the primary tools used to reduce oil and gas development impacts on wildlife. Without meaningful mitigation, however, these stipulations do not enhance, and may not fully protect the long-term viability of wildlife populations. The alternatives have been	The commenter does not provide any additional information on or a definition of what constitutes "meaningful mitigation."	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			modified in regards to raptor management. All alternatives now propose to manage raptors under the August 2006 Best Management Practice for Raptors and Their Associated Habitats in Utah.		
State of Utah	G-1	WF71	The discussion of increases in forage allocations are inconsistently presented in Alternative A for all localities. The State of Utah believes that adequate forage must be provided for wildlife to meet the public's desire for the enjoyment of wildlife species.	The commenter does not indicate what the inconsistencies are. As such, the BLM is unable to address this comment. See Table 2.1.6 (Forage All Localities) of the PRMP/FEIS.	
State of Utah	G-1	WF72	The final RMP should adopt the Utah Strategic Management Plan for Sage-Grouse in conjunction with a full set of mitigation tools and habitat improvement techniques. Application of site-specific modifications to these guidelines should only be made with the full concurrence of the UDWR. Additionally, sage-grouse mitigation and stipulations should be consistent with the current draft BLM Sage-Grouse Conservation Strategy. The final RMP must provide for adoption and implementation of an approved local sage-grouse conservation plan and strategy, currently being prepared by USU Wildlife Extension, local landowners, industry, governments, and agencies. Provisions should be made within the RMP for the adoption of future revisions of approved guidelines, strategies, stipulations, and plans as they become available.	<p>The management actions for protection of sage grouse were based on the State of Utah Strategic Management Plan for Sage Grouse (Alternatives A and B), and Connelly's Guidelines to Manage Greater Sage Grouse Populations and their Habitats (Section 4.15.2.5).</p> <p>In addition, Table 2.1.21 (Special Status Species) of the PRMP/FEIS states:</p> <p>"BLM would continue to work with USFWS and others to ensure that plans and agreements are updated as necessary to reflect the latest scientific data."</p> <p>Table 2.1.21 further states:</p> <p>"Section 2.4.13.4.2.2 states that "In collaboration with the USFWS, DWR, and other partners, develop habitat management plans or conservation</p>	

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				strategies for sensitive species."	
State of Utah	G-1	WF73	The draft RMP does not contain any stipulations or mitigation measures to protect or enhance sage-grouse brooding and winter habitats in the planning area as outlined in the Utah Strategic Management Plan for Sage-Grouse. These guidelines should be incorporated, where appropriate, in all alternatives and practices including grazing, vegetation treatments, fire management, and oil and gas development.	See comment response WF72.	
State of Utah	G-1	WF74	The State of Utah is concerned from both a wildlife and mineral development perspective about the effects of the density of mineral development on wildlife species. The state asks the BLM to participate with it, local government, and industry to find the best balanced approach between access to resource development and meaningful mitigation for wildlife. The state specifically asks the BLM to work with it as the final RMP and EIS are prepared to ensure that enough flexibility is maintained to accomplish this goal.	Comment noted.	
State of Utah	G-1	WF75	The State of Utah requests that the proposals to limit to surface disturbance to 560 acres per township within critical/crucial deer winter range be kept open for further discussion.	Section 4.3.2.11.3 in the PRMP/FEIS (Alternative C) includes the 560 acres surface disturbance proposal as part of the range of alternatives.	
State of Utah	G-1	WF76	In areas such as the Book Cliffs, where summer range is a limiting factor for mule deer, impacts and disturbances to the range should be minimized or mitigated in the same manner as winter ranges.	The commenter does not provide any additional information or explanation to substantiate the assertion regarding mule deer summer range.	
State of Utah	G-1	WF77	The UDWR is concerned that several plans, guidelines, assessments, and databases used in development of the RMP EIS were omitted, used in outdated form, or not fully integrated into the draft. The latest version of the UDWR's critical/crucial wildlife distribution maps should be used, with reference to adoption of future	BLM has adopted the current Utah Sensitive Species List under authority of IM UT 2007-078. In order to keep current with the latest guidance that is developed during the Final EIS process and after the ROD is signed, the BLM has incorporated several statements in Management Common to All	

Wildlife and Fisheries

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			<p>updates as they become available. Resource assessments completed by either the UDWR or the BLM not referenced in the document include 2002 range trend studies, sage-grouse habitat delineation, raptor nest distribution and occupancy, and mule deer winter range delineation in the Book Cliffs. Additional wildlife and habitat plans produced by the UDWR, which should be referenced, include: the current Utah Sensitive Species List, wildlife management area habitat management plans, and game species management plans (deer, elk, bighorn sheep, bear, cougar). Interagency plans which are completed or in draft form and should be referenced include the following sensitive species conservation plans and strategies: Conservation Agreement and Strategy for Colorado River Cutthroat Trout (<i>Oncorhynchus clarki pleuriticus</i>) in the State of Utah, the Range-wide Conservation Agreement for Roundtail Chub (<i>Gila robusta</i>), Bluehead Sucker (<i>Catostomus discobolus</i>), and Flannelmouth Sucker (<i>Catostomus latipinnis</i>), Utah Strategic Management Plan for Sage-Grouse, 2002, Guidelines to Manage Sage-Grouse and their Habitats, and Utah Partners-in-Flight Avian Conservation Strategy.</p>	<p>under Special Status Species and Wildlife that allow for consideration of new information. They are as follows:</p> <ol style="list-style-type: none"> 1) Implement the specific goals and objectives of recovery plans, conservation agreements and strategies, and approved activity level plans. BLM would continue to work with USFWS and others to ensure that plans and agreements are updated as necessary to reflect the latest scientific data. 2) BLM would continue to implement the specific goals and objectives of all recovery plans, conservation plans and strategies, and activity level plans. 3) BLM would continue to work with USFWS and others to ensure that plans and agreements are updated as necessary to reflect the latest scientific data. Recovery plans have been finalized for Uinta Basin hookless cactus, shrubby reed–mustard, and clay reed-mustard. A draft plan is being developed by the USFWS for Ute ladies’ tresses. A Conservation Plan has been prepared for <i>Astragalus equisolensis</i>, <i>Penstemon goodrichii</i>, <i>Penstemon grahamii</i> and <i>Penstemon scarious</i> var. <i>albifluvis</i>. 4) Where special status plant species, including listed T&E plant species, occur on public lands in the planning area, BLM would collaborate with affected local, state, and federal agencies and researchers in the implementation of approved 	

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				recovery plans and conservation strategies to protect, stabilize, and recover such species and their habitats. In addition to on-the-ground actions, strategies would be developed to provide public education on species at-risk, significance of the species to the human and biological communities, and reasons for protective measures that would be applied to the lands involved. Continue or develop monitoring studies in order to determine population dynamics and trends.	
State of Utah	G-1	WF78	Within the "Actions Common to All" section of the RMP EIS, the BLM should commit to implementation of goals and objectives of all current and future approved recovery and conservation plans, strategies, and activities. Future approved research or study results and species/habitat distribution coverages should automatically be updated for planning and action decisions. Failure to do so will diminish the quality of resource decisions based on old or less-than-accurate data.	See comment response WF77.	
State of Utah	G-1	WF79	The UDWR urges the BLM to fully implement BLM Manual 6840 "to conserve listed species and the ecosystems on which they depend" and "to ensure that actions requiring authorization or approval by the Bureau of Land Management...are consistent with the conservation needs of special status species and do not contribute to the need to list any special status species...." Application of accepted guidelines and meaningful mitigation and stipulations are necessary to meet the stated goals of the Manual.	Table 2.1.26 (Wildlife and Fisheries Resources) under the subsection entitled Management Actions Common to All Alternatives states: "Manage habitat to prevent the need for additional listing of species under the ESA and contribute to the recovery of those species already listed."	
State of Utah	G-1	WF79A	The UDWR urges the BLM to incorporate the most current Utah Sensitive Species List, as approved by the Utah Wildlife Board, in development of current and future lists of special status species.	BLM has adopted the current Utah Sensitive Species List under authority of IM UT 2007-078.	

Wildlife and Fisheries

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State of Utah	G-1	WF80	The UDWR supports the cooperative implementation of the goals of the Black-footed Ferret Recovery Plan through augmentation of an existing population in the Snake John Wash area.	Comment noted.	
State of Utah	G-1	WF81	Wildlife and fisheries actions common to all alternatives begin on page 2-36. The UDWR is in agreement that mitigation banking should be used as a method to compensate for habitat loss due to surface disturbing activities. The UDWR views an effective banking system as a way to ensure that meaningful mitigation is completed.	See comment response WF10.	
State of Utah	G-1	WF82	Reintroductions are discussed on page 2-38. The State of Utah maintains legal authority for wildlife management within the State. The UDWR collects public and intergovernmental comment on wildlife management, including species introductions, through a Regional Advisory Council process. Through this process, transplant lists and herd management plans for several species have been created with input from the public and interested parties.	See comment response WF18A.	
State of Utah	G-1	WF82A	As such, UDWR requests that BLM remove paragraph 3 on page 2-38 which states: "After analysis, reintroductions would be made in areas where they do not conflict with livestock or where such conflicts would not be avoided, coordination with permittees would be required," as this is not a BLM prerogative. The state will make these analyses as part of its public review process for reintroductions.	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p>	

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				The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
State of Utah	G-1	WF83	The UDWR supports the decision to continue to allow placement of bear bait on public land through a permit process. Baiting is a legitimate hunting method for archery bear hunts. The UDWR requires notification from bear hunters of bait station locations for law enforcement and compliance purposes.	Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS under the subsection entitled Mountain Lion and Black Bear states: "Placement of bear bait on public land would require a permit." Any bear bait permit would be issued though the UDWR.	
State of Utah	G-1	WF84	Wildlife and fisheries issues begin on page 2-64 of the alternatives matrix. The UDWR supports seasonal stipulation within the McCook Ridge and Monument Ridge mule deer migration corridors.	Comment noted.	
State of Utah	G-1	WF85	The UDWR supports migration and reintroduction of bighorn sheep, bison, and moose in defined areas in the VFO. The UDWR has a legal role in managing wildlife populations, hunting, and fishing in Utah. The UDWR has a public process that allows for public comment on wildlife management activities in Utah. The UDWR encourages the BLM to clarify and define the "Southern Book Cliffs" under the bison reintroduction alternative. The UDWR encourages the BLM to define the bison reintroduction area to be the same as the Book Cliffs Bitter Creek/Little Creek sub-units (Unit 10 a,b).	See comment response WF19.	
State of Utah	G-1	WF86	Chapter 3, specifically the special status species and wildlife sections, does not contain detailed information of local populations within the planning area. The UDWR, BLM, and other cooperators have numerous inventories and publications that offer information on	See comment response WF77.	

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			wildlife populations. These documents should be discussed, referenced, and cited in the RMP. The UDWR recommends this chapter incorporate further analysis of current populations and management.		
State of Utah	G-1	WF87	The fish and wildlife resources section 3.19 begins on page 3-123. Multiple tables within this section confuse the herd unit numbers for Bonanza and Diamond Mountain sub-units. The Bonanza sub-unit number is 9d and Diamond Mountain is 9c. This discrepancy should be changed in tables 3.19.1, 3.19.3, and 3.19.5. In addition, table 3.19.2 appears to be incomplete for mule deer habitat in the VPA.	Table 3.19.2 in the PRMP/FEIS text has been revised to correct and clarify the herd unit numbers and to complete the description of mule deer habitat.	X
State of Utah	G-1	WF88	Table 3.19.3 outlines management goals for mule deer. Some of the population objectives and buck-to-doe ratios are incorrect. The combined mule deer population objective for the South Slope Vernal, Diamond, and Bonanza sub-units is 13,000. The buck-to-doe ratio for South Slope Diamond Mountain (9c) and Book Cliffs Bitter Creek and Little Creek (10a) is 25-30:100. Table 3.19.5 outlines management goals for elk in the VPA. The listed bull age ratios are incorrect. The North Slope (Summit and West Daggett), North Slope Three Corners, South Slope Yellowstone, South Slope Vernal, and South Slope Bonanza sub-units are managed for 50% of bulls 2½ years or older. The South Slope Diamond sub-unit (9c) is managed for bulls 3-4 years old. The Book Cliffs (Bitter Creek and Little Creek) and Nine Mile Anthro sub-units are managed for 5-6 year old bulls. Utah's statewide herd management plans for mule deer, elk, and other species should be referenced and discussed in section 3.19.	Table 3.19.3 used 2002 goals for purposes of analysis of the Draft RMP. Updated goals may be found at the UDWR web site. The PRMP/FEIS text has been revised to correct the errors.	X
State of Utah	G-1	WF89	Section 3.19.1.3 discusses pronghorn in the VPA. This section displays population estimates for several herd	Section 3.19.1.3 in the PRMP/FEIS text has been revised, and trend count data added to the section.	X

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			units. The data referenced are not population estimates, but rather annual trend count numbers. These numbers are used for population trend and do not reflect population sizes. The section does not offer trend count data for the Book Cliffs and Nine Mile pronghorn herd units. Trend data for these units can be obtained by contacting the UDWR Vernal office at 435-781-6707.		
State of Utah	G-1	WF90	Bighorn sheep are discussed on page 3-127. The UDWR is unaware of any large bighorn sheep populations in the Nine-Mile Canyon area. The UDWR manages bighorn sheep populations in Desolation Canyon and on Range Creek, both of which are outside the VFO. The Ute Tribe has bighorn sheep populations in Desolation Canyon and in Hill Creek.	Section 3.19.1.4 in the PRMP/FEIS text has been revised to remove the reference to a sheep population within Nine-Mile Canyon. Bighorn sheep are in the UDWR Nine Mile Unit (#11), which is outside of the VPA.	X
State of Utah	G-1	WF91	Moose populations are outlined in section 3.19.1.5. This section does not mention that moose populations also occur in the North Slope wildlife management unit and does not offer population estimates for that unit.	Section 3.19.1.5 in the PRMP/FEIS has been revised to include moose population information for the North Slope wildlife management unit.	X
State of Utah	G-1	WF92	Section 3.19.1.10 should include Brown's Park and Mallard Springs WMAs as additional important waterfowl and shorebird areas in the VFO.	Section 3.19.1.10 in the EIS text has been revised to include these areas as important to waterfowl.	X
State of Utah	G-1	WF93	Desert and mountain cottontails should be removed from section 3.19.1.12. Cottontail rabbits are managed by the UDWR as upland game species.	The PRMP/FEIS has been revised to move the cottontail information from Section 3.19.1.12 (Non-Game Species) to Section 3.19.1.9 (Upland Species).	X
State of Utah	G-1	WF94	Page 3-133 outlines habitat fragmentation concerns. The section cites a study on mule deer conducted in the Book Cliffs. This study was a four-year inventory (1998-2002), rather than two years as listed in the RMP. The UDWR initially recommended the study continue for five total years, however sufficient data were collected by the fourth year to meet the study objective. More information on fragmentation of mule	Section 4.19.2 in the PRMP/FEIS has been revised to show that the inventory length was four years.	X

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			deer habitat can be found in the study "Mule Deer Conservation: Issues and Management Strategies" by Vos, Conover, and Headrick (2003).		
State of Utah	G-1	WF95	The RMP must develop stipulations and mitigation strategies designed to minimize potential impacts to wildlife, yet allow other resource uses to proceed. No mitigation or other stipulations are presented under alternative A in section 4.19.2.3.1. Mitigation strategies not presented in the document have been developed for several species including mule deer, elk, pronghorn, Greater Sage-grouse, bighorn sheep, white-tailed prairie dogs, Mountain Plovers, Burrowing Owls, and black-footed ferrets. These should be presented and further developed to include each of the species listed in sections 4.15 and 4.19.	Stipulations for surface disturbing activities relative to wildlife and special status species are outlined in Appendix K. Spatial buffers and seasonal mitigation for special status raptor species are outlined in Appendix A. Specific mitigation measures for wildlife and special status species also are developed at the project level, when the particular species involved and the nature of the potential impacts are known. Please also see comment response WF77.	
State of Utah	G-1	WF96	Section 4.19 on page 4-305 should include an additional impact of grazing management decisions on wildlife. Livestock grazing in critical big game winter ranges, riparian areas, and sage-grouse areas has the potential to impact wildlife by changing vegetation composition and structure. These impacts are real and should be analyzed in the RMP.	Section 4.19 in the PRMP/FEIS has been revised to include an analysis of the impacts of livestock and grazing management actions on wildlife.	X
State of Utah	G-1	WF97	The RMP confuses UDWR GIS data and Utah GAP Analysis data in section 4.19.2.5.2.1 on page 4-314 and in section 4.19.2.5.2.2 on page 4-316. Utah State University developed GAP Analysis projected habitat occurrence data for several wildlife species during the mid-1990s. The UDWR GIS database includes, in part, habitat value designations as well as season of use designations for big game and other managed wildlife species	Sections 4.19.2.5.2.1 and 4.19.2.5.2.2 in the PRMP/FEIS text have been revised to clarify the use of UDWR GIS data and Utah GAP analysis data.	X
State of Utah	G-1	WF98	The UDWR recommends that the RMP further address cumulative impacts in both the special status species section (4.22.9) and the wildlife and fisheries section	Sections 4.22.10 (special status species) and 4.22.12 (wildlife and fisheries) in the PRMP/FEIS have been revised to provide more information on	X

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			(4.22.12). The RMP should provide more information regarding past activities and projected future activities in the Uintah Basin and the combined impacts these actions may have on wildlife populations.	cumulative effects.	
State of Utah	G-1	WF99	The UDWR notes that the sage-grouse lek buffers subject to timing and controlled use on figure 11, figure 12, and figure 13 may be incorrect. USU completed a resource assessment for BLM and documented leks, winter use areas, and other grouse observations. The data displayed on figure 11 appear to represent all data points USU collected, many of which are not actual lek locations. This discrepancy occurred on the sage-grouse lek map BLM had in the administrative draft RMP and appears not to have been corrected. The UDWR maintains the most up-to-date database for sage-grouse leks and those data should be used for the RMP.	Figures 11-13 in the PRMP/FEIS have been revised to correct sage grouse lek buffers.	X
Duchesne County	G-9	WF35	This conclusion does not appear to be adequately supported by findings in the chapter and is an overstatement of the potential impacts.	Section 4.15.6 in the PRMP/FEIS has been revised to include supporting statements for the conclusion reached in this section.	X
Duchesne County	G-9	WF36	Efforts have not been made in Alternative B to allocate forage to wild horses.	The commenter is correct. Alternative B represents part of the range of alternatives by CEQ regulations (40 CFR 1502.1).	X
Duchesne County	G-9	WF37	Alternative B should be amended to allow for UDWR involvement in analyzing exceptions to the dates as in Alternatives A and C.	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 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	

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				<p>essential in this process and full consideration was given to all potential alternatives identified.</p> <p>The BLM determined that a single alternative analyzing the protection of all Non-WSA lands with wilderness characteristics would best provide a reasoned choice among the alternatives. Although the other alternatives do not provide specific management prescriptions to protect Non-WSA, these alternatives analyze and disclose the impacts of the proposed resource management prescriptions, uses and actions on the Non-WSA lands with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.</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>	
Duchesne County	G-9	WF38	Alternative C will have a lesser beneficial long-term impact than Alternative A because of the restrictions on removal of woodland materials within ACEC's under Alternative C.	Comment noted.	
Duchesne	G-9	WF54	Alt B does not include the 560 acres per township	Section 4.16.2.15.1 in the PRMP/FEIS has been	X

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County			limitation for wildlife, according to Table 2.3 on pg 2-65. Alts A and C contain this limitation, while Alt B has a 10% habitat threshold. Duchesne Co. supports Alt B and the 10% threshold.	revised to correct the analysis error for Alternative B.	
Duchesne County	G-9	WF55	This section is supposed to address the cumulative effects on wildlife and fisheries but seems to focus on the effects to vegetation.	As described in the cumulative impacts (Section 4.22.12), the impacts of the mentioned oil and gas exploration and development projects would impact vegetation. Restated in another way, the Impacts to vegetation and other surface disturbances could have direct and cumulative impacts on wildlife and fisheries by adversely impacting the habitat (e.g., vegetation) upon which they depend for food, shelter, and reproduction.	
U.S. Fish and Wildlife Service	G-12	WF134 (JWF-24)	More fish and wildlife impact minimization measures are needed to meet mgt goals. DEIS briefly mentions habitat banking; we encourage a more thorough discussion of this strategy. Should also establish time frames for determining when remedial actions are required. DEIS should include a table/discussion relative to thresholds for disturbance, at which point mgt action would be triggered (i.e. rest, mitigation, restoration). Should partner with industry, FWS, DWR, FW, NRCS etc for this.	See comment response WF10.	
U.S. Fish and Wildlife Service	G-12	WF135 (JWF-25)	DEIS should treat migratory birds in their own section. DEIS is currently inconsistent; 2.4.18.2.6 section is separate, but in Ch 3 they are grouped differently. Birds protected under migratory Bird Treaty Act should merit separate section and separate consideration. BLM should specify the migratory species on FWS Birds of Concern and Utah Partners in Flight Priority Species lists and provide description of habitats, threats and known areas of concentration.	Comment noted.	
U.S. Fish and Wildlife	G-12	WF136	Utah Bird Habitat Conservation Areas (UBHCA) should be incorporated. IN the VPA, the areas identified are:	Comment noted.	

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Service		(JWF-26)	Red Mountain, Diamond Mountain, Blue Mountain, the Pariette wetlands, the Green River corridor, Willow Creek and Bitter Creek. These areas should be managed with migratory bird nesting habitat in mind.		
U.S. Fish and Wildlife Service	G-12	WF137 (JWF-27)	Management specific to wildlife should incorporate the life history needs and habitat requirements of BSS and PIF species. Migratory bird analysis should be incorporated into all resource programs (ACECs, decisions re: forage availability and use, etc)	Comment noted.	
U.S. Fish and Wildlife Service	G-12	WF138 (JWF-28)	Should use most recent BLM BMPs. Should delete all references to BMPs as being comparable to FWS Raptor guidelines; they are separate and not intended to be used in lieu of Raptor guidelines. 2002 Raptor Guidelines should be included as an Appendix.	As per Instruction Memorandum No. UT 2006-096 (Best Management Practices for Raptors and Their Associated Habitats) dated September 6, 2006, raptors are now managed under the in Utah under all alternatives.	
U.S. Fish and Wildlife Service	G-12	WF139 (JWF-29)	Benefits to wildlife are discussed but negatives are not fully disclosed. For example, Alternative A's precluding mineral entry on withdrawn lands is beneficial, but the table on page 2-103 does not list the 18,945 acres of surface disturbance that will occur under Alternative A from mineral development. The harmful effects of this are not discussed.	Detailed information about the impacts of minerals and energy program decisions on wildlife and fisheries can be found in Sections 4.19.1 and 4.19.2.5.	
U.S. Fish and Wildlife Service	G-12	WF140 (JWF-30)	Mitigation, monitoring, funding and partnership to achieve mitigation of impacts to wildlife needs more thorough discussion.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	WF141 (JWF-31)	In accordance with Executive Order 13186, conservation of migratory birds and their habitats should be addressed in federal planning documents; therefore, they should be included as an issue needing attention. Neither previous plan (Diamond Mountain or Book Cliffs) addressed migratory birds because E.O. 13186 was not signed until January of 2000. Specifically, species identified as Birds of Conservation Concern by the Service and species listed on the Partners in Flight Priority list should be described in	Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS states: "In accordance with Executive Order 13186, incorporate conservation measures for the protection of migratory birds, as outlined in the Utah Partners-In-Flight Avian Conservation Strategy and other scientific information, into all surface-disturbing activities."	

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			terms of habitats, threats, and potential impacts from activities in the VPA.		
U.S. Fish and Wildlife Service	G-12	WF142 (JWF-32)	We recommend you set goals for migratory bird habitat conservation, restoration, and enhancement.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	WF143 (JWF-33)	The document states, "In accordance with Executive Order 13186, incorporate conservation measures for the protection of migratory birds, as outlined in the Utah Partners-in-Flight Avian Conservation Strategy and other scientific information, into all surface-disturbing activities." We commend you for this commitment, but remind you that the Strategy does not provide conservation measures for all species addressed in E.O. 13186 that may use the VPA. We recommend you broaden our statement accordingly.	See comment response WF141.	
U.S. Fish and Wildlife Service	G-12	WF144 (JWF-34)	We commend the BLM for the commitment to "pursue a partnership between industries, local governments, USFWS, UDWR, BLM, and others to establish a raptor management fund to be utilized for raptor population monitoring and habitat enhancement." We recommend you also include, at a minimum, the Forest Service and NRCS. We offer our assistance in establishing this partnership.	Table 2.1.21 (Special Status Species) of the PRMP/FEIS has been revised to include the USFS and NRCS.	X
U.S. Fish and Wildlife Service	G-12	WF145 (JWF-35)	We appreciate the actions provided to conserve aspects of forested and riparian habitats that provide nesting and foraging opportunities for cavity-nesting and riparian-obligate species, However, we recommend you also develop conservation measures for avian species with other nesting or foraging requirements, for example, ground-nesting or cliff nesting species. Additional measures should be developed for species breeding in all habitat types.	Comment noted.	
U.S. Fish and	G-12	WF146	We recommend that a habitat mitigation plan be	Comment noted.	

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Wildlife Service		(JWF-36)	developed prior to any significant ground disturbing activity, not just tar sand development.		
U.S. Fish and Wildlife Service	G-12	WF147 (JWF-37)	1st sentence: All the raptor species found in the VPA are federally protected under the Migratory Bird Treaty Act. We recommend you reword the sentence to reflect that all have federal protection and several have additional state protection.	Section 3.19.1.11 In the PRMP/FEIS text has been revised to include a reference to protection of raptors under the Migratory Bird Treaty Act.	X
U.S. Fish and Wildlife Service	G-12	WF148 (JWF-38)	2" paragraph: The BLM proposes employment of a raptor database using information from an ongoing study, which intends to determine the nesting requirements and seasonally important rapt or habitats located on public lands within the VPA. Using this database to track nest sites and important raptor habitat location, the document outlines the next step: "oil and gas development maps will be used to develop predictive models for raptor/energy conflicts, and to develop mitigation measures for unleased parcels." We believe this approach, as proposed, will fail to protect raptors because: 1) the utility of the ongoing study has yet to be determined, and it may not provide the level of information necessary, and 2) virtually all the habitat for the most sensitive raptor species in the VPA has already been leased for development, so there will be few acres with mitigation applied.	Section 3.19.1.11 in the PRMP/FEIS has been revised to the delete the following sentence: "Oil and gas development maps will be used to develop predicted models for raptor/energy development conflicts, and to develop mitigation measures for unleased parcels."	X
U.S. Fish and Wildlife Service	G-12	WF149 (JWF-39)	We appreciate tile discussion of habitat fragmentation and recommend that impacts to migratory birds be included in both the discussion and the big-game research being coordinated with UDWR.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	WF150 (JWF-39)	The document states that the mitigation measures described under the heading Management Common to All would reduce unavoidable adverse impacts to the extent possible. We disagree with this statement and reiterate the need for additional mitigation measures, including avoidance and compensation.	Comment noted.	

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U.S. Fish and Wildlife Service	G-12	WF151 (JWF-40)	The document states that there is the possibility of an irreversible loss of a small isolated wildlife population due to the habitat fragmentation from minerals development, "particularly if reclamation of cleared well pads and roads does not occur within 20 to 30 years." We agree with the statement. We also believe that, given the limited capacity of some soils to be reclaimed, the longevity of existing oil and gas fields, the prospect of future development, and lack of adequate mitigation in the document, the irreversible loss of a small isolated wildlife population is probable.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	WF152 (JWF-41)	The discussion of Cumulative Impacts on Wildlife and Fisheries does not detail what the overall impact will be from all resource decisions on wildlife and fisheries. The section is copied from two paragraphs in the Special Status Species cumulative impacts section, but there is no further determination of what the impact would be to fish and wildlife resources.	Section 4.22.12 in the PRMP/FEIS has been revised to include a more comprehensive analysis of cumulative impacts on wildlife and fisheries.	X
Daggett County	G-17	WF111 (AWF-2)	On page 1-9 there is a paragraph discussing the "...establishment of thresholds for disturbance that could be accommodated without significant impacts to wildlife populations..." Again, it seems that wildlife considerations are given priority over multiple uses. In most instances wildlife are quite comfortable moving in and out of human areas and the consideration that hunting is a disturbance never seems to get any attention. While we do not want to see irreparable damage that would completely ruin or destroy wildlife areas, minor disturbances that promote multiple use and improvement of habitat should be allowed.	Comment noted.	
UBAOG	G-22	WF10	This section should be rewritten to include recent off-site mitigation, which provides for habitat banking.	BLM would consider off-site mitigation as a method to offset impacts due to surface disturbing activities.	
UBAOG	G-22	WF11	Add after "activities"	The BLM declines to make the suggested wording changes for a variety of reasons including but not	

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			<p>"only if it is voluntary and there is a causal connection to the impacts being mitigated."</p>	<p>limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>The BLM would consider off-site mitigation as a method to offset impacts due to surface disturbing activities.</p>	
UBAOG	G-22	WF11A	<p>The RMP needs to conform to the IM on mitigation and the case law that requires a causal connection. The RMP currently promotes buying out of grazing permits without regard to the impacts on resource management, the economy, community and law and regulation.</p>	<p>The commenter does not indicate which IM on mitigation he/she believes applies to the statement in question. As many IMs on the subject of mitigation exist, the BLM is unable to specifically address this portion of the comment.</p>	
UBAOG	G-22	WF12	<p>Add: "When reintroduction of a species will result in impacts on private land, the landowners must also consent."</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the</p>	

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				<p>current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
UBAOG	G-22	WF12A	Where reintroduced species could come on private lands, reintroduction cannot occur without their agreement.	Any reintroduction of species in the planning area would be subject to site-specific NEPA, which would include an analysis of potential impacts to private landowners. Landowners and other interested parties would have an opportunity to comment on the proposed introduction and potential conditions and/or mitigations for that introduction during the public involvement process for that NEPA analysis.	
UBAOG	G-22	WF13	<p>Add:</p> <p>"When the reintroduced species is subject to the ESA, it will be experimental nonessential. Coordination needs to be clearly understood to be consent."</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
UBAOG	G-22	WF13	Any reintroductions that would affect private landholders or permittees should not be publicly reviewed through RAC but through County Authority as provided by Uintah County General Plan.	Whether or not a reintroduced species that is subject to ESA is classified as experimental nonessential is outside of the scope of this planning process. The USFWS determines the status of reintroduced federally listed species.	

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				<p>Any public review of federally-listed species reintroductions would be conducted through site-specific NEPA led by the USFWS.</p> <p>See comment response WF12A.</p>	
UBAOG	G-22	WF14	The RMP fails to provide a scientific basis for these restrictions and clearer limits.	These restrictions are based on management direction that was carried forward from the Diamond Mountain RMP (in Appendix K).	
UBAOG	G-22	WF15	Requirement to modify fence to protect wildlife should not be at permittee's expense and should be made clear here.	Payment of fence modification will be determined during site specific project planning.	
UBAOG	G-22	WF16	There is no requirement on habitat mitigation plan from oil & gas. Just to get a lease you have to submit a plan.	Habitat and mitigation plans are required as part of the plan of operation.	
UBAOG	G-22	WF17	<p>We fail to see the need for a protection for migrating deer. The Uintah County Plan provides for protections in these areas on winter range and fawn activities, which clearly are more critical activities for deer.</p> <p>There appears to be no justification for this alternative. It is not an issue raised in the AMSs and seems to be centered on mineral development activity. Most of the migration corridor overlaps deer and elk crucial winter range and it is protected from activities that would have adverse impacts on deer and elk from November 15 to April 30. In some of these acres, surface disturbing activities could only be permitted from 4/14 - 9/1 (4 1/2 months) of additional time such as a nesting raptor. As written, this is not consistent with Uintah County Plan. It is unlikely that the level of activity would ever be at a level that it would impact the ability of deer to migrate</p>	<p>Deer migration occurs outside of the November 15 to April 30th time period. Migration is vital to deer survival because it allows animals to move to lower elevations, including crucial winter range, to obtain forage during the critical fall and winter months. The need to maintain wildlife migration corridors has been well documented in both the scientific literature and through BLM and UDWR biologist's experience.</p>	

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			between ranges given the topography, screening provided by area vegetation, and the size of the area. There is no analysis of need, impacts and restriction being least restrictive as necessary.		
UBAOG	G-22	WF18	<p>Add to Alternative A:</p> <p>“Bighorn sheep reintroduction or emigration will not be proposed or permitted in an area within nine (9) miles of land currently permitted to domestic sheep.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
UBAOG	G-22	WF18A	<p>It is the Counties position that the legal and primary use of forage in grazing districts is livestock. Reintroductions of bighorn sheep in areas grazing by domestic sheep or cattle is sure to create conflicts. Any proposal to restrict grazing for wildlife purposes is counter to County Plans.</p>	<p>Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS states that</p> <p>“Reintroduction of native fish and wildlife species into appropriate habitats would be accomplished through coordination with UDWR, counties, and interested publics through appropriate public participation processes. Reintroductions would involve, but may not be limited to, native species such as Rocky Mountain big horn sheep, moose, bison, and Colorado River cutthroat trout, and wild turkey.”</p>	
UBAOG	G-22	WF19	This alternative as well as the next on bison should provide for cooperation, consultation, and collaboration	Comment noted.	

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			with the counties.		
UBAOG	G-22	WF2	The RMP fails to document or support the "crucial winter or other big game" habitat. It is rarely clear whether UDWR has updated or expanded these areas as well as what is the scientific basis for such classifications.	<p>Section 3.19.1.2 of the PRMP/FEIS states that:</p> <p>"Crucial winter range is considered to be the part of the local deer and elk range where approximately 90% of the local population is located during an average of five winters out of ten from the first heavy snowfall to spring green-up."</p> <p>The BLM has adopted the Utah Division of Wildlife Resources' (UDWR) identification of crucial winter habitat.</p>	
UBAOG	G-22	WF20	Strike "emigration and/or".	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
UBAOG	G-22	WF20A	The counties are opposed to emigration of Bison or Big Horn Sheep or any other species that may impact the use of lands for livestock grazing or other development. Such animals outside of their designated areas are to be trespassed and removed. Such emigrations should	See comment response WF18A.	

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			on a case by case basis be allowed after full NEPA analysis to determine impacts on forage, livestock and other wildlife populations.		
UBAOG	G-22	WF21	There is no indication of the type of disturbance that is to be reclaimed. One assumption would be surface disturbance if so. There is nothing in the text to support the need for 1.5:1 mitigation ratio. It must not be based on habitat loss as such habitat should be avoided to the extent possible. When area disturbance is located outside sage brush habitat when reclamation is complete often habitat is created or forage plants are established where they did not exist prior. This issue has been one of long-time contention. The 1.5:1 ratio is the result of a negotiation that began with a 3:1 ratio and bargained down. The bottom line is that reclamation should be based on the amount of habitat lost. The goals expressed in CHS, to double and triple mule deer and elk populations would appear to be a driving force behind forced increases in habitat.	Alternative A in Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS has been revised to reflect a 1:1.5 ratio.	X
UBAOG	G-22	WF22	The requirement [for a 1.5:1 ratio] is not consistent with Uintah County's Plan. It is forced habitat development beyond what was disturbed 1:1. The County Plan requires avoidance of such areas when possible--that requirement should be included here. By avoidance of these areas and reclamation of disturbed areas at 1:1 it is likely that habitat will be increased.	See comment response WF21.	
UBAOG	G-22	WF23	Alternative B: The County Plan requires that in addition to [1:1 habitat development], roads are to be consolidated, pipelines and utilities will be placed in corridors.	Table 1.2.7 (Lands and Realty Management) of the PRMP/FEIS under the subsection entitled Transportation/Utility Corridors states that priority would be placed on placing pipelines and other utilities within existing ROW corridors, including roads	
UBAOG	G-22	WF24	This standard needs to be limited to surface disturbing activities and to only apply to significant impact. The	The language in alternative A applies to any activity that has a potential for adverse impact. Impacts will	

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			RMP must ensure that restrictions have a scientific basis. For example, it is shown that big game become accustomed to incidental uses of a road by motor vehicles or even drilling in the distance. If the activity involves 6 acres out of 18,000 acres it is difficult to show that this is significant activity. The oil and gas industry has extensive experience working in big game habitat and there is scant support for the assumption of long-term ill effects. Big game numbers are high and population trends are upwards. Thus, it is difficult to justify closures that are being proposed in the RMP.	be analyzed during site specific NEPA.	
UBAOG	G-22	WF25	EPCA, Executive Orders and BLM Policy require more detailed analysis and documentation than what is found in the draft RMP. EPCA, executive orders, and BLM direction require analysis of need for such restrictions based on science and that such restrictions are the least restrictive needed; this has not been accomplished. The proposed restriction should be rewritten based on proper analysis or select alternatives. Reanalyze base on substantiate species needs that justify the dates and analyze impacts on other resources and uses.	The alternatives analyzed in the PRMP/FEIS include a range of management restrictions related to oil and gas development. As per EPCA, this range of management restrictions was developed specifically for the purpose of determining that is the least restrictive alternative with regards to oil, gas, and mineral development, while still retaining the long-term productivity of other resources in the planning area. The analysis of the impacts of these alternatives on oil and gas development and on these other resources is disclosed in Chapter 4 of the PRMP/FEIS. The final determination on the most appropriate alternative to meet EPCA while providing for other resource use and long-term sustainability will be disclosed in the Record of Decision (ROD).	
UBAOG	G-22	WF26	Add to this alternative that criteria for such waiver must be developed within 6 months of the ROD. The provisions here are meaningless and lack certainty without any guidance on how they will be applied.	The criteria are spelled out adequately in this alternatives matrix to be applied as programmatic direction at the planning level. For example, there isn't a need to elaborate on the statement "If the animals are not present" or "topography screens activity sufficiently so the proposed activity does not displace subject species". Site-specific analysis would be required for each waiver to determine if	

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				they meet the criteria described here and would include additional description and rationale as to whether these criteria are met or not.	
UBAOG	G-22	WF27	<p>The Uintah County Public Land Implementation Plan established a 10% trigger level for such disturbances. It was based on the following: When development was proposed in the area of the existing crucial deer winter range, the range was greatly expanded based on the best guess of a biologist. When the increase was challenged a study was conducted to substantiate his finding. It has long been the Counties position that an unbiased review of the study would reveal that the actual boundaries and acres is somewhat less than the boundaries established and according to the DWR some of the crucial habitat is used only 30% of the time. This raises the question of how crucial some of the habitat is and what the actual impact of a surface disturbance would be in these areas. The fact that there are goals to double or triple deer and elk populations that are dependent on these crucial ranges indicates that these ranges are not used to capacity at this time and that a 10% impact should not affect current populations. As written, Alternative B is the only acceptable alternative.</p>	<p>To ensure that the functional value of the crucial range is available for wildlife, it needs to be protected during the seasonal use of that range. Projected will be evaluated on a site specific basis to mitigate impacts outside of the timing restrictions.</p> <p>Additionally, the commenter has not shown how he/she has determined that BLM or UDWR has the goal of doubling or tripling deer and elk populations. Doubling or tripling the deer and elk population is not a goal of this RMP planning process and analyzing the potential impacts of this would be speculative in that UDWR has shown no plans to double or triple deer or elk numbers in the planning area.</p>	
UBAOG	G-22	WF28	<p>This statement omits the continued grazing of these areas by big game and wild horses. It also discloses that the RMP would only manage livestock, contrary to established policy that requires BLM to make reductions based on causation. The RMP cannot try to place the entire management burden on the livestock industry.</p>	<p>Table 2.1.6 (Forage All Localities) of the PRMP/FEIS includes the allocations of AUMs for livestock, wildlife, and wild horses.</p>	
UBAOG	G-22	WF29	<p>Relying solely on utilization without monitoring is inconsistent with BLM rules and policy.</p>	<p>However, nowhere is it stated in the Draft RMP that vegetation utilization would not be monitored. Various alternatives in Table 2.1.25 (Wild Horses) of</p>	

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				<p>the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives state that their goal is to:</p> <p>“Achieve and maintain a desired plant community that would provide palatable, nutritious forage for wild horses while sustaining rangeland health and a thriving natural ecological balance.”</p> <p>Also see Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS under the subsection entitled Habitat Improvements.</p>	
UBAOG	G-22	WF3	<p>There should be a clear distinction between introduction, reintroduction and emigration. Glossary should provide a definition of each. Emigration should not be handled as a reintroduction. The Uintah County Plan provides that animals outside of their permitted area are in trespass. Such animals should be removed. To allow emigration requires planning and forage adjustments after the fact and is not sound management. Emigration requires the same analysis and disclosure as do other decisions.</p>	<p>The Glossary of the Final EIS has been revised to clarify the meaning of “introduction,” “reintroduction,” and “emigration.”</p> <p>The commenter was not clear in defining what “permitted area” means.</p>	X
UBAOG	G-22	WF30	<p>The effects [on wildlife] are grossly overstated and ignore reclamation and mitigation.</p>	<p>The commenter does not provide any additional information nor states how or why the Draft RMP grossly overstates and ignores reclamation and mitigation.</p>	
UBAOG	G-22	WF31	<p>Strike "would" in the first sentence. Replace with - "may".</p> <p>Not all reintroduction efforts will uniformly benefit wildlife habitat. For example, increased prairie dog populations to support the black-footed ferret will have</p>	<p>Table 2.3 in the Final EIS has been revised with the suggested changes.</p>	X

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			significant and adverse impacts on rangeland vegetation. While this is justified under the ESA, the RMP cannot ignore the damage done and resulting increase in sediment and erosion, loss of native vegetation, etc.		
UBAOG	G-22	WF32	The RMP discussion should also address changes in big game and wildlife populations and trends. The Counties believes the elk numbers, for example, in this region are increasing and are believed to be in an upward trend for the next decade. If UDWR has increased its herd objectives that fact is also relevant to the issue of where rangeland conditions are not achieving rangeland health standards and the contributing factors.	BLM coordinates with UDWR in the management of this habitat to help ensure that UDWR wildlife management goals are being addressed. This coordination includes determination on the appropriate big game herd numbers to ensure that forage meets Rangeland Health Standards and forage production for livestock is not decreased (See Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS under the subsections entitled Goals and Objectives.	
UBAOG	G-22	WF33	Throughout this section there is discussion on wildlife populations and population objectives or the AUM's levels assigned to wildlife. As written this implies that population goals drive management not resource capacities. These issues need to be addressed. See general comments on forage/grazing.	Chapter 3 describes the current condition of the VPA's affected environment, and Section 3.19 describes the current conditions and resource objectives for wildlife and fisheries. Proposed management decisions for wildlife and fisheries under the revised RMP are stated in Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS and were derived through the RMP process described in Section 1.5.	
UBAOG	G-22	WF34	The DEIS does not define and appears to misuse the term "habitat fragmentation." The discussion incorrectly states that agriculture uses fragment habitat. Agriculture in the planning area is primarily ranching and it does not "fragment habitat." Second, the alleged fragmentation is probably due to private land ownership along water bodies. Unless the land uses prevent life processes, it is inaccurate to describe the habitat as fragmented. Moreover, fragmentation means different things to different species and the	The Section 3.19.2 in the PRMP/FEIS has been revised to include a definition for habitat fragmentation. Otherwise, the commenter does not provide any additional information to substantiate or support the assertions made concerning habitat fragmentation within the VPA.	X

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			broad-brush discussion incorrectly assumes that habitat changes have an equal effect.		
UBAOG	G-22	WF35	This conclusion does not appear to be adequately supported by findings in the chapter and is an overstatement of the potential impacts.	Section 4.15.6 in the PRMP/FEIS has been revised to include supporting statements for the conclusion reached in this section.	X
UBAOG	G-22	WF36	Efforts have not been made in Alternative B to allocate forage to wild horses.	The commenter is correct. Alternative B represents part of the range of alternatives by CEQ regulations (40 CFR 1502.1).	X
UBAOG	G-22	WF37	Alternative B should be amended to allow for UDWR involvement in analyzing exceptions to the dates as in Alternatives A and C.	<p>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 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 determined that a single alternative analyzing the protection of all Non-WSA lands with wilderness characteristics would best provide a reasoned choice among the alternatives. Although the other alternatives do not provide specific management prescriptions to protect Non-WSA, these alternatives analyze and disclose the impacts of the proposed resource management prescriptions, uses and actions on the Non-WSA lands with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness</p>	

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				<p>characteristics on these Non-WSA lands. If all alternatives contained comparable protections of the Non-WSA lands with wilderness characteristics, the alternatives would have substantially similar consequences and would not be significantly distinguishable.</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>	
UBAOG	G-22	WF38	Alternative C will have a lesser beneficial long-term impact than Alternative A because of the restrictions on removal of woodland materials within ACEC's under Alternative C.	Comment noted.	
UBAOG	G-22	WF39	Here it refers to a 7 year nest monitoring period. There is no definition of what this is and it is not contained in section J, Inventory and Monitoring.	<p>As per Instruction Memorandum No. UT 2006-096 dated September 6, 2006 raptors will now be managed under the Best Management Practices for Raptors and Their Associated Habitats in Utah under all alternatives. The BMPs allow for modifications to the spatial and seasonal buffers so long as protection of nesting raptors is ensured. Criteria that would need to be met, prior to implementing modifications to the spatial and seasonal buffers and allowances for local nesting chronologies are outlined in Appendix A.</p> <p>As a programmatic NEPA and planning document, the RMP and EIS are not site-specific. Project-related site-specific conditions would be analyzed and mitigated through other NEPA processes and</p>	

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				documents.	
UBAOG	G-22	WF4	The document as a whole fails to address coyotes, foxes and ravens. Control of these is critical to sustaining and increasing sage grouse populations and should be addressed.	Predator control is implemented by the Animal and Plant Health Inspection Service (APHIS). Table 2.1.26 (Woodlands and Forests Resources) of the PRMP/FEIS states: "Coordinate with Animal and Plant Health Inspection Service (APHIS) to prepare an annual operating plan for predator control within the planning area."	
UBAOG	G-22	WF40	A 1.5:1 ratio is not measurable and is counter to County Plans.	See comment responses WF1 and WF 44A.	
UBAOG	G-22	WF41	A 3:1 ratio is not measurable and is counter to County Plans.	See comment response WF44A.	
UBAOG	G-22	WF42	October 1 - May 31 is a six-month migration. The migration is not that long. The draft contains no analysis of need.	Alternative D is the No Action Alternative, which means that this reflects the current resource management situation within the VPA. There is no analysis of need because it is the current RMP management action against which the other proposed action alternatives are compared, as required by NEPA.	
UBAOG	G-22	WF43	This stipulation applies to the whole 472,000 acres. Counties do not want this stipulation in Alternative B. This would not allow any activity on 10% or 47,000 acres. It is the Counties position that there are other methods to address this issue and they should be explored.	See comment response WF37 and WF44A.	
UBAOG	G-22	WF44	To not allow activities that would result in adverse impacts is open ended and could be interpreted to prohibit any type of activity and close the area for recreation road use, normal development, maintenance, etc. The exception pertaining to the expected duration of disturbance should be added to corridor exceptions. This comment should be added to	See comment response WF37.	

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			the language in modifications and waivers above.		
UBAOG	G-22	WF44A	The provision not to allow any adverse impact is counter to the Uintah County Plan which would not allow displacement from more than 10% of their winter habitat.	FLPMA states that resource management planning on federally-administered land coordinate with, be consistent with county plans to the maximum extent possible, and resolve to the extent practicable inconsistencies between federal and non-federal government plans (FLPMA, Title II (c)(9)). Thus, while county and federal planning processes, under FLPMA, are required to be as integrated and consistent as practicable, the federal agency planning process is not bound by or subject to county plans, planning processes, or planning stipulations.	
UBAOG	G-22	WF45	As written stipulations are not consistent with Uintah County Plan. The plan provides for exceptions when animals are not present.	<p>The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p> <p>Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning</p>	

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				<p>stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.</p>	
UBAOG	G-22	WF5	<p>Throughout the draft there are discussions on how wildlife populations are to be managed, and management prescriptions have been developed. The BLM has no control over wildlife populations. When there is an increase in wildlife AUM's consumed it is likely that the burden of these reductions will fall on livestock. To prevent this and to provide for a method for implementing management prescriptions contained in the RMP, the RMP should contain a provision for development of an MOA between the BLM and the State of Utah regarding these issues as well as addressing forage allocations. Increases in wildlife populations should be based on availability of forage. Such increases must be analyzed and impacts disclosed and that has not been done.</p>	<p>The BLM has responsibility to manage wildlife habitat as part of its multiple use mandate (cite FLPMA and the Multiple Use Sustained Yield Act). BLM coordinates with Utah Division of Wildlife Resources (UDWR) in the management of this habitat to help ensure that UDWR wildlife management goals are being addressed. This coordination includes determination on the appropriate big game herd numbers to ensure that forage meets Rangeland Health Standards and forage production for livestock is not decreased. See Table 2.1.26 (Woodlands and Forests Resources) of the PRMP/FEIS .</p> <p>Site specific action plans and MOAs may be developed as part of the implementation of the RMP.</p>	
UBAOG	G-22	WF6	<p>The three bullets on 2-3 and the last bullet on 2-4 use the word "would" as a directive. The top bullet on 2-4 "wildlife management" states that discussions would be held with DWR. The Counties requests to be included in discussion regarding these bulleted issues. These decisions affect the Counties.</p>	<p>Table 2.1.1 (Management Common to All Alternatives under the subsection entitled Fire, Drought, and Natural Disasters states that the BLM would coordinate with affected parties. Counties could also be considered affected parties.</p>	
UBAOG	G-22	WF7	<p>As written, range health and viability, as well as animal health, will be impacted beyond levels that should be allowed. Wildlife populations are usually controlled through hunting in the fall. The time it takes from the</p>	<p>See comment response WF5.</p>	

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			beginning of discussions to actual reduction in wildlife numbers could greatly increase recovery time for both habitat and wildlife numbers. Rewrite to provide for earlier discussions and adjustments of wildlife numbers. Additionally similar language should be added to provide for such adjustments in other situations when rangeland health is threatened. An MOU between BLM and The State of Utah should be implemented to provide and govern such communication.		
UBAOG	G-22	WF8	<p>"During periods of prolonged dryness or drought, to the extent that wildlife grazing ungulate populations cannot be sustained due to competition for water and available forage, and overall animal health is compromised. BLM would enter into discussions with the Utah Division of Wildlife Resources (UDWR) regarding herd numbers and overall management options to combat the effects of drought."</p> <p>Remove "and overall animal health is compromised."</p> <p>Remove "combat" on last line and add "ensure that rangeland health is maintained and to address."</p>	Table 2.1.1 (Management Common to All Alternatives under the subsection entitled Fire, Drought, and Natural Disasters has been revised to incorporate the suggested changes.	X
UBAOG	G-22	WF8A	The criteria for initiating discussions with UDWR should not be animal health, because this would allow range health to be harmed so long as animal health is not.	See comment response WF5.	
UBAOG	G-22	WF9	Any "need of conservation" needs to be limited to ESA. The UDWR plans do not meet "species and habitat" in need of conservation. Any state habitat plans must be based on available forage for subject species.	Any "need of conservation" should be related to all species as described in BLM Manual 6840.	
Ute Tribe of the Uintah and Ouray	G-26	WF68	The Ute Tribe supports the protection measures for deer and elk and provision of habitat and forage for the reintroduction of bighorn sheep, bison, and moose as	Comment noted.	

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Reservation			described under Alternatives A and C, as these animals are of great importance to the Tribe. We also support timing limitations and controlled surface use stipulations for other wildlife species, including sage grouse breeding grounds and raptor nests, as specified in the draft RMP/EIS and Appendix K.		
Ute Tribe of the Uintah and Ouray Reservation	G-26	WF69	<p>The Ute Tribe requests that the BLM include the following stipulations in the RMP/EIS in order to minimize disturbance to game species of importance to the Tribe:</p> <p>Vehicular traffic shall be prohibited during the breeding and calving season and hunting seasons for deer, elk, bighorn sheep, and buffalo; and</p> <p>All bear and mountain lion lairs shall be protected to avoid or minimize any potential impacts to bears and mountain lions.</p>	BLM acknowledges the Tribe's comment; however, the suggested language is more applicable to site-specific proposals. Also, since the BLM is not the surface management agency, it seems more appropriate for the Tribe to develop these conditions of approval based upon current resource conditions and their desired land use objectives.	
Ute Tribe of the Uintah and Ouray Reservation	G-29	WF210	The Ute Tribe has identified areas of no leasing/activity as Chandler Canyon, the Green River corridor and steep canyon country of the connected drainages. These areas provide important habitat for Rocky Mountain bighorn sheep, and are considered critical year-round range for bighorn.	<p>The Chandler Canyon area of the Hill Creek extension would be managed by the BLM under timing and controlled surface use stipulations under Alternatives A, B, C, and E. Management under these stipulations would be conducted in coordination with the Ute Tribe.</p> <p>The Upper Green River Corridor is designated as no surface occupancy for line of sight from the centerline, up to ½-mile along both sides of the river from Little Hole to the Colorado State line. The Lower Green River Corridor is designated as no surface occupancy for line of sight from the centerline, up to ½-mile along both sides of the river from the trust land boundary at Ouray and the Carbon County line.</p>	
Ute Tribe of	G-29	WF211	The Ute Tribe has identified Wild Horse Basin as an	Please, see the response to Comment WF210 as	

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the Uintah and Ouray Reservation			area of no leasing/activity as it provides critical winter range and transitional spring and fall range for deer, elk and bison. This designation of no leasing/no activity also extends to the area south of Wild Horse Basin and into the area including Moon Water Canyon and Chandler Point.	the same stipulations apply to the Wild Horse Basin-Moon Water Canyon-Chandler Point area.	
Ute Tribe of the Uintah and Ouray Reservation	G-29	WF212	The Wolf Flat project area provides critical winter habitat for big game. Limited activity, i.e. no new drilling of wells, should occur from December through March. Much of the area is also important bison calving habitat. Limited activity should occur during April and May.	The Wolf Flat area of the Hill Creek Extension would be managed by the BLM under timing and controlled surface use stipulations under Alternatives A, B, C, and E. These stipulations include timing limitations for deer and elk winter range from November 15 through April 30 under Alternatives A and C and timing limitation for deer and elk winter range from December 15 to March 15 under Alternative B.	
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.	
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 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.	Comment noted.	
Nancy	I-162	WF103	Through the Vernal RMP revision, implement road	Please refer to comment response SS149.	

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Bostick		(WF-A)	<p>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> <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>		
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.	<p>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.</p> <p>The Final EIS has been updated to include the latest and most current T&E and special status species designations.</p>	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.	
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.	

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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 put forth in the BLM 6840 Manual."	X
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.	

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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.	
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	Comment noted.	

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			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.		
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.	
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.	
Newfield Exploration Co.	O-4	WF1	The EIS does not adequately demonstrate that reclaiming or enhancing sagebrush habitat at a ratio of 1.5:1 will benefit wildlife.	Section 3.19 of the Draft EIS describes the importance of sagebrush habitat to various wildlife species. By reclaiming or enhancing sagebrush habitat at a greater ratio to that which is impacted, more habitats will be provided to sagebrush obligate species. This will provide benefits such as increased availability of forage and cover.	

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				See comment response WF 21.	
The Nature Conservancy Moab Project Office	O-6	WF157 (LWF-5)	The multi-state CA developed by the UDWR should be noted in the RMP.	See comment response WF77.	
The Nature Conservancy Moab Project Office	O-6	WF158 (LWF-6)	The RMP needs to address the management of linkage zones for the lynx.	A small portion of the lynx linkage zone (See Figure 34) is on BLM lands and is in an area with low potential for mineral development. The remainder is on private and Forest Service lands. Any proposed development in the area would require site-specific NEPA analysis and would consider the impacts to the lynx linkage zone.	
Utah Wildlife Federation	O-11	WF106 (WF-D)	The answer for the BLM is to not restrict leasing, but rather to restrict the terms of leases. This mitigation measure intends to make everyone happy by leaving the areas in question open to development under terms that presumably have the fewest deleterious impact to fish and wildlife. However, when the impact of gas and oil development particularly coal bed methane on fish and wildlife are largely unknown and the few studies that have been conducted point towards detrimental effects, the effectiveness of these stipulations is questionable. This approach is irresponsible and no stipulations can mitigate that.	<p>All BLM-administered public lands within the VPA fall under one of the following four leasing categories for oil and gas development:</p> <ol style="list-style-type: none"> 1) Standard Stipulations; 2) Timing and Controlled Surface Use; 3) No Surface Occupancy; 4) Closed to leasing. <p>The lands are categorized through the RMP process by considering resources and resource uses in the area and analyzing the impacts to them under each alternative. Standard stipulations also requires that a "lessee shall conduct operations in a manner that minimizes adverse impacts to the land, air, and water, to cultural, biological, visual, and other</p>	

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				resources, and to other land uses and users.	
Utah Wildlife Federation	O-11	WF107 (WF-E)	The threats to mule deer and elk with in the East Tavaputs Plateau RFDA are most pointedly habitat fragmentation and displacement from suitable winter range due to gas and oil development exploration. Moreover, the UDWR conclude in a four-year study (1998-2002) that "accelerated oil and gas development in the Book Cliffs - East Tavaputs RFDA has the potential to further displace big game animals and increase habitat fragmentation during winter range, thereby lowering the carrying capacity of the range. Given these facts, the development of those habitats deemed "critical" to mule deer and elk would be a profound disregard for the public trust and could result in deer hunting closures similar to those enacted during the late 1990s.	See comment response WF46.	
Utah Wildlife Federation	O-11	WF108 (WF-F)	Pronghorn habitat deemed "critical" by UDWR exists primarily within the monument –Red Wash RFDA. Despite this fact, pronghorn are scarcely mentioned in the text of the Draft EIS. However, they are devoted a table – number 6 on page I-8 of the appendices, that shows Alt C – the one deemed to "focus on the protection of natural and cultural resources"-leaves 71% of pronghorn habitat open to oil and gas development under standard stipulations. That is to say that for the majority of those leases, the BLM will not even be taking their-"mitigation through stipulation" approach to protecting these critical pronghorn habitats.	Comment noted.	
Utah Wildlife Federation	O-11	WF60	The greater sage grouse has seen recent population declines all across its historical range and the Vernal Planning Area is no exception. Areas of the VPA that provide important habitat for the greater sage grouse include the mid-level elevations of the Book Cliffs and	As described in Table 2.1..21 (Special Status S) of the PRMP/FEIS, Alternatives A: (1) Connelly's Guidelines to Manage Sage Grouse Populations and Their Habitats, which recommends	

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			<p>the Uinta Basin, with Diamond Mountain retaining one of the strongest populations in Utah. The draft EIS states that under Alternative C, 95% of all sage grouse habitat would be open for leasing, with 41% of that under no special stipulations to protect grouse. Under the same alternative, 93% of essential sage grouse brooding habitat would be open to leasing with 43% of those areas critical to sage grouse recovery open to leasing with no lease stipulations. It is essential that current populations and habitats are not only maintained, but improved upon to prevent further population declines of this important game bird and the possibility of future federal listing. The Vernal RMP can be part of this effort to prevent ESA listing by designating the Coyote Basin/Shiner ACEC and abiding by the conservation strategy for public land habitats as outlined in the UDWR Strategic Management Plan for Sage Grouse 2002. This plan relates directly to oil and gas development with two stipulations: 1) Avoid the development of roads, fences, poles, and utility lines within 1300 feet of a lek, and 2) Avoid human disturbances within 0.6 mile of a lek during breeding season (March 1 to May 31) from one hour before sunrise to three hours after sunrise.</p>	<p>no surface disturbing activities within two miles of active sage grouse leks from March 1 through June 15 and no surface disturbing activities within one-quarter mile of active sage grouse leks year round, would be implemented.</p> <p>(2) No permanent facilities or structures would be allowed within two miles when possible.</p>	
Utah Wildlife Federation	O-11	WF61	<p>The reintroduction efforts of Colorado River cutthroats into the upper Willow Creek and Bitter Creek areas of the Book Cliffs by the UDWR could be compromised by aquifer dewatering and water quality issues stemming from Coal Bed Methane development.</p>	<p>The commenter does not provide any additional information to substantiate the assertion that impacts from coal bed methane operations would cause aquifer dewatering. Analysis of site-specific coal bed methane impacts is beyond the scope of the EIS and would be analyzed in other site-specific, project-related NEPA documents.</p>	
Utah Wildlife Federation	O-11	WF62	<p>Protecting the East Tavaputs Plateau and the critical wildlife areas within it should be a priority.</p>	<p>Comment noted.</p>	
Utah Wildlife	O-11	WF63	<p>The protections afforded to wildlife under Alternative C</p>	<p>Comment noted.</p>	

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Federation			(e.g., Main Canyon ACEC, Bitter Creek ACEC, Bitter Creek/PR Spring ACEC, Bitter Creek WSR, Book Cliffs Mountain ISA, and the Winter Ridge WSA) should be considered a minimum as the other alternatives offer even fewer designations and would certainly result in more lost hunting opportunities.		
Utah Wildlife Federation	O-11	WF64	From a fisheries standpoint, the lost angling opportunities could be trout angling opportunities as well as warm water fishing for bass and panfish in lakes of the Uinta Basin being hampered by increased runoff and impaired water quality due to a rise in total dissolved solids. For the trout angler, coldwater fishing in Jones Hole Creek could be compromised by indirect sedimentation and pollution. In addition, designations in place to preserve the world class trout fishing in the Green River below Flaming Gorge Reservoir should not be taken for granted or considered a given. All of the proposed protections for this area should be sought out, including Red Creek ACEC, Browns Park ACEC, West Cold Springs WSA, Diamond Breaks WSA, and the Upper Green River WSR designation.	Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS states: "The VFO would assist in implementing the strategic plan for Utah's Initiative on Blue Ribbon Fisheries by managing aquatic and riparian habitats along the Green River, from the Ashley National Forest border to the Colorado/Utah border, for a quality cold water sport fishery and Pelican Lake for a quality warm water sport fishery. In addition, any aquatic and riparian habitats along other waters identified as Blue Ribbon Fisheries would be managed for quality sport fisheries. The VFO would implement this initiative to the extent consistent and appropriate with the Vernal RMP and other land use authorizations."	
Questar	O-12	WF153 (LWF1)	Explain why there is a 1.5:1 ratio for sagebrush habitat in Alternative A and a 1:1 ratio in Alternative B.	See comment response WF21.	
Newfield Exploration Co.	O-13	WF104 (WF-B)	The adoption of the "Fish and Wildlife's Guidelines for Raptor Protection" would prohibit us from developing some of our acreage. The overall goal of the guidelines is to protect the nests from becoming unsuitable nesting sites. Newfield has been able to work with the BLM on a site-by-site basis to achieve both development and protection of the nest. Adoption of these guidelines is both unnecessary and will only hinder the development of the resource and not further	The Utah BLM raptor BMPs were adopted through IM UT-2006-096 and are incorporated in Appendix A	

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			protect the nests.		
Newfield Exploration Co.	O-13	WF105 (WF-C)	What does enhancement of sagebrush habitat entail? A large percentage of Newfield's activities occur within sagebrush habitat; thus, this stipulation would be particularly burdensome. The EIS has not adequately demonstrated that reclaiming or enhancing sagebrush at a 1.5:1 ratio will benefit wildlife.	As stated in Table 2.1.26 (Special Status Species) of the PRMP/FEIS, the Utah Strategic Management Plan For Sage Grouse (2002) would be adopted as the baseline threshold for management of the species under Alternative A. Habitat enhancement is described therein. Also, sagebrush habitat enhancement is described in Connelly's Guidelines to Manage Sage Grouse Populations and Their Habitats which is also proposed under other alternatives. See comment response WF21.	
IPAMS	O-14	WF153 (LWF1)	Explain why there is a 1.5:1 ratio for sagebrush habitat in Alternative A and a 1:1 ratio in Alternative B.	See comment response WF21.	
IPAMS	O-14	WF154 (LWF-2)	Include data by Irby et al (1987) that mule deer are not affected by low intensity oil and gas operations. Not strong enough data to justify NSO.	The summary of the study conducted by Irby et al. in Section 4.19.2.5.2.1 also identified impacts from oil and gas exploration and development on mule deer that did have adverse impacts on the species, notably habitat loss and/or degradation of habitat.	
IPAMS	O-14	WF155 (LWF-3)	The restriction on operations in sage grouse habitats is inconsistent in Appendix K and the timing restrictions. Add 'active lek' to restrictions.	Appendix K in the PRMP/FEIS has been revised to correct the inconsistencies.	X
IPAMS	O-14	WF156 (LWF-4)	Stipulations in these appendices are restrictive without due cause and should be altered to reflect site-specific resources	Comment noted.	
IPAMS	O-14	WF2	The RMP fails to document or support the "crucial winter or other big game" habitat. It is rarely clear whether UDWR has updated or expanded these areas as well as what is the scientific basis for such classifications.	Section 3.19.1.2 of the PRMP/FEIS states that: "Crucial winter range is considered to be the part of the local deer and elk range where approximately 90% of the local population is located during an	

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				<p>average of five winters out of ten from the first heavy snowfall to spring green-up.”</p> <p>The BLM has adopted the Utah Division of Wildlife Resources' (UDWR) identification of crucial winter habitat.</p>	
Trout Unlimited	O-27	WF46	Continued gas or oil development in summer range, winter range, and migration corridors would be a huge detriment to this recovering deer herd and we suggest that for the sake of these resources and the hunters of Utah, that the Final Vernal RMP stipulate that migration corridors as well as those areas deemed critical winter range and critical summer range be off limits to further gas and oil leasing and that applications for permits to drill that are approved on existing leases stipulate "no surface occupancy" within the aforementioned areas.	The RMP proposes a no surface disturbing restriction under all alternatives during April and May (exact timeframes vary) in the McCook and Monument Ridge migration corridors. The RMP alternatives also propose that any activities that would result in adverse impacts to deer and elk within crucial winter range would not be allowed from approximately November to April (exact timeframes vary).s depending on the alternative... April (exact timeframes vary).	
Trout Unlimited	O-27	WF47	We ask that critical elk winter range identified by the UDWR and located within the Tabiona-Ashley Valley RFD area be conserved through timing and controlled surface use stipulations that minimize habitat fragmentation and protect elk during this crucial winter months.	The RMP goals and objectives for wildlife, stated in Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS, are to protect wildlife habitat, and manage for unfragmented blocks of wildlife habitat. Actions Common to All alternatives include management actions that would reduce habitat fragmentation from oil and gas development through reduction in surface disturbances. Existing and future habitat fragmentation of Tabiona-Ashley RFD are provided in Appendix I, Tables 23-24.	
Trout Unlimited	O-27	WF48	No surface disturbing activities within two miles of active sage grouse leks from March 1 to June 15. No surface disturbing activities within one-quarter mile of active sage grouse leks year round. No permanent facilities or structures would be allowed within two miles. Within .5 mile of known active leks, the best available technology should be used to reduce noise, such as installation of multi cylinder pumps, hospital	A range of alternatives for protecting sage grouse is presented in Table 2.1.21 (Special Status Species) of the PRMP/FEIS.	

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			sound mufflers, and the placement of exhaust systems.		
Trout Unlimited	O-27	WF49	We recommend that the final RMP include the Coyote Basin/Shiner ACEC in order to protect the relatively strong population of sage grouse that utilize the Diamond Mountain Area.	Comment noted.	
Trout Unlimited	O-27	WF66	Considering our lack of knowledge about impacts of gas and oil development on fish and wildlife populations, particularly in regards to coal bed methane development, and indications that impacts can be serious and far-reaching, we urge the BLM to slow down, develop a better understanding of current fish and wildlife populations and needs across the landscape, and consider the cumulative impacts of such wide-scale development, across such a large land mass, on fish, wildlife and hunting and angling opportunities.	Comment noted.	
Trout Unlimited	O-27	WF67	We ask that a comprehensive mitigation plan be created to head off the human and wildlife threats from elevated levels of selenium in soils and waterways resulting from minerals development and to be proactive at mitigating this current and burgeoning problem. Within that plan we are asking to include a ban on hydraulic fracturing in areas where the underlying geology is composed of Mancos Shale, regulations requiring the reinjection of CBM produced wastewater, prohibiting surface disturbing activities within highly seleniferous soils, and that both water concentrations and aquatic life tissue sample concentrations are regularly monitored within the VPA.	<p>The Clean Water Act requires that all discharges of pollutants to surface water must be authorized by a permit issued under the National Pollutant Discharge Elimination System (NPDES). The water policy of the BLM is that the states have the primary authority and responsibility for the allocation and management of water resources within their own boundaries, except as otherwise specified by Congress.</p> <p>BLM would apply and comply with water quality standards established by the State of Utah (R.317-2) and the Federal Clean Water and Safe Drinking Water Acts. Activities on BLM administered lands would support the designated beneficial uses described in the Utah Water Quality Standards (R.317-2) for surface water and groundwater.</p>	

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				<p>The RMP proposes several goals, objectives, and actions common to all alternatives that are proactive measures to prevent soil and water degradation. They are:</p> <ol style="list-style-type: none"> 1) Eliminate or reduce discharge of pollutants into surface waters and achieve water quality that provides protection and propagation of fish, amphibians, wildlife, livestock, and recreation in and on the water. 2) Restore and maintain the chemical, physical and biological integrity of the area's waters as required by the State of Utah's and EPA's water quality standards. 3) The VFO would operate under the unified policy to protect water quality and aquatic ecosystems on federal lands (Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management). This policy guides protection of water quality and aquatic ecosystem health through the reduction of polluted runoff, the improvement of natural resources stewardship, and an increase in public involvement in watershed management on federal lands. 4) Collaborate with the state, counties, Tribes, and the Division of Water Rights when possible to protect and enhance priority watersheds. 	

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				<p>5) Cooperate with states and Tribes to review processes for issuing and renewing use authorizations and licenses when these uses/licenses may affect watershed condition and water quality. Revise these processes if necessary to ensure that they address watershed protection, improvement, and monitoring and water quality compliance needs.</p> <p>6) Continue partnership with State of Utah, Daggett County, UDWR, USFS, Wyoming Fish and Game, and Rock Springs BLM to develop a watershed activity plan for Red Creek in Daggett County.</p> <p>7) Restore and protect water quality and severe and critical erosion areas by restricting or mitigating surface disturbance.</p> <p>8) Comply with standards identified in "The Surface Operating Standards for Oil and Gas Exploration and Development" (Gold Book) unless otherwise specified in the plan.</p> <p>9) BLM would adhere to criteria outlined in the Colorado River Salinity Control Act.</p> <p>10) Work in partnership with the State of Utah and others to reduce potential effects of selenium loading on the Ouray National Wildlife Refuge and Pariette Wetlands.</p>	

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				<p>11) Ensure the physical presence and legal availability of water on public lands. Ensure that those waters meet or exceed established federal and state water quality standards for specific uses, and mitigate activities to prevent water quality and watershed degradation.</p> <p>12) Reduce sediment and salinity production on important watersheds and critical soils through intensive management and construction measures to reduce water degradation of the Green River, White River, and their tributaries.</p> <p>13) The State of Utah's Non-Point Source Management Plan would be used as a standard to reduce potential non-point source of pollution impacts. Coordinate with the Utah Division of Water Quality as needed.</p> <p>14) Work in partnership with the State of Utah and others to reduce potential effects of selenium loading on the Ouray National Wildlife Refuge and Pariette Wetlands.</p>	
Westport Oil and Gas Company	O-28	WF56	Table 2.3, Alternative A, Nest Protection for Raptors, Unoccupied Nests — is inconsistent with the information provided in Appendix A. Appendix A states that no activities would be allowed within the buffer until seven-year monitoring is complete. Table 2.3, on the other hand, states that non-permanent (short-term) activities would be allowed within the spatial buffer of nests during the nesting season as long as those activities are shown to have no effect on nesting raptors. It is necessary for Appendix A to be consistent	See comment response WF39.	

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			with Table 2-3. Allowances for permanent (long-term) structures should also be given, if these activities would not affect raptor nesting.		
Westport Oil and Gas Company	O-28	WF57	P.4-315, 4.19.2.5.2.1, Paragraph (Big Game Species)—This paragraph discussed a paper by Irby et al (1987) on mule deer which states that the authors were unable to detect a response by mule deer to low intensity oil and gas exploration and gas drilling activities. It also refers to a paper by Karpowitz (1984), who also investigated the impacts of energy development on mule deer and found it difficult to assess. Since neither report (Irby et al 1987; Karpowitz 1984) cited in the draft RMP provides definitive evidence on impacts of oil and gas development on mule deer, it is inappropriate to base resource planning decisions upon these findings. In addition, all information presented in the Karpowitz (1984) paper was speculative. Data that support the stipulation should be included in the RMP. Otherwise, the stipulation should be deleted.	The commenter incorrectly interprets the analyses described in Section 4.19.2.5.2.1. A more careful reading of the section shows that the studies cited by the commenter do include inconclusive and speculative outcomes of these studies, but the section also describes the substantive conclusions and observations derived from these studies that form the basis for the analyses in the section.	
Westport Oil and Gas Company	O-28	WF58	<p>We strongly object to the adoption of the stipulations in Appendices A and H, as they are extremely restrictive without due cause and would cause severe and unacceptable adverse impacts on the ability of oil and gas operators to fulfill their lease obligations. Since the proposed stipulations often do not provide any data or literature that supports the proposed restrictions, BLM's stipulations appear to be capricious. Many stipulations described in Appendices A and H are too general in nature and do not consider differences that may occur on a resource or site-specific basis. Following are examples in relation to these comments:</p> <p>Section 4.19.2.5.2.3 states that "All alternatives would</p>	See comment response WF39.	

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			<p>apply spatial and temporal buffers to minimize disturbances in the vicinity of nesting raptors. The buffers were tailored to the individual raptor species involved, and were based on factors, such as line of sight distance between nest and disturbance, type and duration of disturbance, nest structure security, sensitivity of the species to disturbance, observed response to related disturbances, and the amount of existing disturbances near the nest". Although these factors are listed, no specific reports are cited that document how different raptor species are affected by physical disturbances. In addition, if these factors are the parameters for developing spatial buffers and timing limitations, then application of a 0.5 mile spatial buffer for all raptor species (Appendix H — Alternative A) is not consistent with the identified criteria.</p> <p>The overall goal of applying spatial and temporal buffers around unoccupied raptor nests is to avoid causing the nests to become unsuitable for future nesting. Therefore, if it is determined by site-specific evaluation, that an activity would have no effect on future raptor nesting then the 0.5 mile stipulation should be waived. Therefore it is appropriate for BLM to implement exception, waiver, and modification criteria that would allow surface disturbance during the timing limitation, provided the nest is protected from visual and/or noise impacts by topography and/or vegetative screening, or once the young have successfully fledged the respective nest.</p> <p>Appendix A states that the implementation of spatial and seasonal buffers would be comparable to the USFWS, Utah Field Office 'Guidelines for Raptor</p>		

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			<p>Protection from Human and Land Use Disturbances” (January 2002). Appendix A states that unoccupied nests would be monitored for seven years. Aside from the fact that such a time frame is excessive, there is no explanation in the draft RMP/EV3 for the requirement of a seven-year nest monitoring period for unoccupied raptor nests. If the rationale is contained in the USFWS guidelines, the guidelines should be included as an appendix to the RMP/EIS. If it is not included in the USFWS guidelines, this requirement must be deleted.</p> <p>Unoccupied raptor nests have the potential to remain visible for many years. Therefore raptor nest conditions must be considered when establishing stipulations regarding spatial and temporal buffers. Raptor nest conditions vary depending upon several factors including age, substrate, previous usage, etc. Nests in “Good” to “Excellent” condition are either usable or need only minor attention in order to be used again (BLM — Powder River Basin Wildlife Survey Protocol), while nests in “Poor” or “Fair” condition would need significant repair to become functional. As the potential for reestablishment of “Poor” or “Fair” nests would be much less likely, stipulations regarding these nests should not be identical to nests currently in good or excellent condition.</p> <p>Based upon the resilience of raptor nests, thousands of unoccupied raptor nests likely occur throughout the Vernal planning area. If surface disturbing stipulations were activated within 0.5 mile of every unoccupied raptor nest regardless of nest condition, oil and gas operators would be unable to fulfill their lease</p>		

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			<p>obligations within the planning area.</p> <p>Raptor species have different nesting requirements. Some species typically reuse nests year after year (i.e., bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with oil and gas industry, other agencies, and other key stakeholders.</p> <p>Raptor species have different nesting requirements. Some species typically reuse nests year after year (i.e., bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas</p>		

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			<p>operations in cooperation with oil and gas industry, other agencies, and other key stakeholders.</p> <p>Appendix A states that the implementation of spatial and seasonal buffers would be comparable to the USFWS, Utah Field Office 'Guidelines for Raptor Protection from Human and Land Use Disturbances" (January 2002). Appendix A states that unoccupied nests would be monitored for seven years. Aside from the fact that such a time frame is excessive, there is no explanation in the draft RMP/EV3 for the requirement of a seven-year nest monitoring period for unoccupied raptor nests. If the rationale is contained in the USFWS guidelines, the guidelines should be included as an appendix to the RMP/EIS. If it is not included in the USFWS guidelines, this requirement must be deleted.</p> <p>Unoccupied raptor nests have the potential to remain visible for many years. Therefore raptor nest conditions must be considered when establishing stipulations regarding spatial and temporal buffers. Raptor nest conditions vary depending upon several factors including age, substrate, previous usage, etc. Nests in "Good" to "Excellent" condition are either usable or need only minor attention in order to be used again (BLM — Powder River Basin Wildlife Survey Protocol), while nests in "Poor" or "Fair" condition would need significant repair to become functional. As the potential for reestablishment of "Poor" or "Fair" nests would be much less likely, stipulations regarding these nests should not be identical to nests</p> <p>Raptor species have different nesting requirements. Some species typically reuse nests year after year (i.e.,</p>		

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			<p>bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with oil and gas industry, other agencies, and other key stakeholders. currently in good or excellent condition.</p> <p>Based upon the resilience of raptor nests, thousands of unoccupied raptor nests likely occur throughout the Vernal planning area. If surface disturbing stipulations were activated within 0.5 mile of every unoccupied raptor nest regardless of nest condition, oil and gas operators would be unable to fulfill their lease obligations within the planning area.</p>		
Westport Oil and Gas Company	O-28	WF59	<p>Table 2, in Appendix I, shows that timing limitations and controlled surface use stipulations in mule deer crucial winter range habitat have increased from 37% of the area under Alternative D (existing RMPs) to 93% of the area considered by the BLM for mineral leasing under Alternatives A and B. The references cited in the draft RMP (Irby et al 1987, Karpowitz 1984, Van Dyke and Klein 1996 do not support the large scale timing limitations and controlled surface use stipulations. The rationale for these stringent stipulations needs to be explained in the RMP/EIS. The stipulations for elk</p>	See comment response WF39.	

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			<p>crucial winter range habitat also cover a larger area (68% Alternative A vs. 34% Alternative D). However, no basis has been given for increasing the area covered by stipulations for protecting mule deer crucial winter range habitat and elk crucial winter range habitat. Absent established scientific justification, this change must be withdrawn in the final document.</p> <p>Table 19 in Appendix I indicates that 92% of ferruginous hawk nesting habitat is under standard stipulations and only 7% is under timing limitations and controlled surface use stipulations. This is inconsistent with Table 4.8.6, which has timing restrictions from March 1 to August 1 for ferruginous hawk nests. It is also inconsistent with Appendix H, which has a 0.5-mile buffer for occupied and unoccupied ferruginous hawk nests. It is also inconsistent with Appendix K, which specifies “planning area wide” spatial and seasonal buffers for raptors. These are not standard stipulations.</p>		
KerrMcGee Oil and Gas Onshore LLC	O-29	WF56	Table 2.3, Alternative A, Nest Protection for Raptors, Unoccupied Nests — is inconsistent with the information provided in Appendix A. Appendix A states that no activities would be allowed within the buffer until seven-year monitoring is complete. Table 2.3, on the other hand, states that non-permanent (short-term) activities would be allowed within the spatial buffer of nests during the nesting season as long as those activities are shown to have no effect on nesting raptors. It is necessary for Appendix A to be consistent with Table 2-3. Allowances for permanent (long-term) structures should also be given, if these activities would not affect raptor nesting.	See comment response WF39.	
KerrMcGee	O-29	WF57	P.4-315, 4.19.2.5.2.1, Paragraph (Big Game	The commenter incorrectly interprets the analyses	

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Oil and Gas Onshore LLC			<p>Species)—This paragraph discussed a paper by Irby et al (1987) on mule deer which states that the authors were unable to detect a response by mule deer to low intensity oil and gas exploration and gas drilling activities. It also refers to a paper by Karpowitz (1984), who also investigated the impacts of energy development on mule deer and found it difficult to assess. Since neither report (Irby et al 1987; Karpowitz 1984) cited in the draft RMP provides definitive evidence on impacts of oil and gas development on mule deer, it is inappropriate to base resource planning decisions upon these findings. In addition, all information presented in the Karpowitz (1984) paper was speculative. Data that support the stipulation should be included in the RMP. Otherwise, the stipulation should be deleted.</p>	<p>described in Section 4.19.2.5.2.1. A more careful reading of the section shows that the studies cited by the commenter do include inconclusive and speculative outcomes of these studies, but the section also describes the substantive conclusions and observations derived from these studies that form the basis for the analyses in the section.</p>	
KerrMcGee Oil and Gas Onshore LLC	O-29	WF58	<p>We strongly object to the adoption of the stipulations in Appendices A and H, as they are extremely restrictive without due cause and would cause severe and unacceptable adverse impacts on the ability of oil and gas operators to fulfill their lease obligations. Since the proposed stipulations often do not provide any data or literature that supports the proposed restrictions, BLM's stipulations appear to be capricious. Many stipulations described in Appendices A and H are too general in nature and do not consider differences that may occur on a resource or site-specific basis. Following are examples in relation to these comments:</p> <p>Section 4.19.2.5.2.3 states that "All alternatives would apply spatial and temporal buffers to minimize disturbances in the vicinity of nesting raptors. The buffers were tailored to the individual raptor species involved, and were based on factors, such as line of</p>	<p>See comment response WF39.</p>	

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			<p>sight distance between nest and disturbance, type and duration of disturbance, nest structure security, sensitivity of the species to disturbance, observed response to related disturbances, and the amount of existing disturbances near the nest". Although these factors are listed, no specific reports are cited that document how different raptor species are affected by physical disturbances. In addition, if these factors are the parameters for developing spatial buffers and timing limitations, then application of a 0.5 mile spatial buffer for all raptor species (Appendix H — Alternative A) is not consistent with the identified criteria.</p> <p>The overall goal of applying spatial and temporal buffers around unoccupied raptor nests is to avoid causing the nests to become unsuitable for future nesting. Therefore, if it is determined by site-specific evaluation, that an activity would have no effect on future raptor nesting then the 0.5 mile stipulation should be waived. Therefore it is appropriate for BLM to implement exception, waiver, and modification criteria that would allow surface disturbance during the timing limitation, provided the nest is protected from visual and/or noise impacts by topography and/or vegetative screening, or once the young have successfully fledged the respective nest.</p> <p>Appendix A states that the implementation of spatial and seasonal buffers would be comparable to the USFWS, Utah Field Office "Guidelines for Raptor Protection from Human and Land Use Disturbances" (January 2002). Appendix A states that unoccupied nests would be monitored for seven years. Aside from the fact that such a time frame is excessive, there is no</p>		

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			<p>explanation in the draft RMP/EV3 for the requirement of a seven-year nest monitoring period for unoccupied raptor nests. If the rationale is contained in the USFWS guidelines, the guidelines should be included as an appendix to the RMP/EIS. If it is not included in the USFWS guidelines, this requirement must be deleted.</p> <p>Unoccupied raptor nests have the potential to remain visible for many years. Therefore raptor nest conditions must be considered when establishing stipulations regarding spatial and temporal buffers. Raptor nest conditions vary depending upon several factors including age, substrate, previous usage, etc. Nests in “Good” to “Excellent” condition are either usable or need only minor attention in order to be used again (BLM — Powder River Basin Wildlife Survey Protocol), while nests in “Poor” or “Fair” condition would need significant repair to become functional. As the potential for reestablishment of “Poor” or “Fair” nests would be much less likely, stipulations regarding these nests should not be identical to nests currently in good or excellent condition.</p> <p>Based upon the resilience of raptor nests, thousands of unoccupied raptor nests likely occur throughout the Vernal planning area. If surface disturbing stipulations were activated within 0.5 mile of every unoccupied raptor nest regardless of nest condition, oil and gas operators would be unable to fulfill their lease obligations within the planning area.</p> <p>Raptor species have different nesting requirements.</p>		

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			<p>Some species typically reuse nests year after year (i.e., bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with oil and gas industry, other agencies, and other key stakeholders.</p> <p>Raptor species have different nesting requirements. Some species typically reuse nests year after year (i.e., bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with oil and gas industry, other agencies, and other key stakeholders.</p>		

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			<p>Appendix A states that the implementation of spatial and seasonal buffers would be comparable to the USFWS, Utah Field Office ‘Guidelines for Raptor Protection from Human and Land Use Disturbances’ (January 2002). Appendix A states that unoccupied nests would be monitored for seven years. Aside from the fact that such a time frame is excessive, there is no explanation in the draft RMP/EV3 for the requirement of a seven-year nest monitoring period for unoccupied raptor nests. If the rationale is contained in the USFWS guidelines, the guidelines should be included as an appendix to the RMP/EIS. If it is not included in the USFWS guidelines, this requirement must be deleted.</p> <p>Unoccupied raptor nests have the potential to remain visible for many years. Therefore raptor nest conditions must be considered when establishing stipulations regarding spatial and temporal buffers. Raptor nest conditions vary depending upon several factors including age, substrate, previous usage, etc. Nests in “Good” to “Excellent” condition are either usable or need only minor attention in order to be used again (BLM — Powder River Basin Wildlife Survey Protocol), while nests in “Poor” or “Fair” condition would need significant repair to become functional. As the potential for reestablishment of “Poor” or “Fair” nests would be much less likely, stipulations regarding these nests should not be identical to nests</p> <p>Raptor species have different nesting requirements. Some species typically reuse nests year after year (i.e., bald eagles, golden eagles, and osprey). However, some species (e.g., ferruginous hawks) build multiple nests in close proximity on an annual basis, and only</p>		

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			<p>use one for rearing young. Therefore, by not developing species- specific stipulations for unoccupied nests, unneeded restrictions would be applied.</p> <p>Appendices A and H be must be rewritten; and, rather than instituting blanket stipulations, we recommend that BLM commit to developing stipulations (as well as the associated exception, waiver and modification) for surface-disturbing activities resulting from oil and gas operations in cooperation with oil and gas industry, other agencies, and other key stakeholders. currently in good or excellent condition.</p> <p>Based upon the resilience of raptor nests, thousands of unoccupied raptor nests likely occur throughout the Vernal planning area. If surface disturbing stipulations were activated within 0.5 mile of every unoccupied raptor nest regardless of nest condition, oil and gas operators would be unable to fulfill their lease obligations within the planning area.</p>		
KerrMcGee Oil and Gas Onshore LLC	O-29	WF59	<p>Table 2, in Appendix I, shows that timing limitations and controlled surface use stipulations in mule deer crucial winter range habitat have increased from 37% of the area under Alternative D (existing RMPs) to 93% of the area considered by the BLM for mineral leasing under Alternatives A and B. The references cited in the draft RMP (Irby et al 1987, Karpowitz 1984, Van Dyke and Klein 1996 do not support the large scale timing limitations and controlled surface use stipulations. The rationale for these stringent stipulations needs to be explained in the RMP/EIS. The stipulations for elk crucial winter range habitat also cover a larger area (68% Alternative A vs. 34% Alternative D). However, no basis has been given for increasing the area</p>	See comment response WF39.	

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			<p>covered by stipulations for protecting mule deer crucial winter range habitat and elk crucial winter range habitat. Absent established scientific justification, this change must be withdrawn in the final document.</p> <p>Table 19 in Appendix I indicates that 92% of ferruginous hawk nesting habitat is under standard stipulations and only 7% is under timing limitations and controlled surface use stipulations. This is inconsistent with Table 4.8.6, which has timing restrictions from March 1 to August 1 for ferruginous hawk nests. It is also inconsistent with Appendix H, which has a 0.5-mile buffer for occupied and unoccupied ferruginous hawk nests. It is also inconsistent with Appendix K, which specifies “planning area wide” spatial and seasonal buffers for raptors. These are not standard stipulations.</p>		
Cripple Cowboy Cow Outfit	O-30	WF50	Keep in mind that washes will heal w/o the trampling of domestic livestock on the banks. As long as elk are this thick you will not be able to grow Cottonwoods. If you fence springs, you will have to also develop them to keep the animals from tearing down the fence.	Comment noted.	
Cripple Cowboy Cow Outfit	O-30	WF51	Ferruginous Hawks seem to do fine where there are not Prairie Dogs, so extra protection for rodents does not seem warranted.	Comment noted.	
Cripple Cowboy Cow Outfit	O-30	WF52	The elk will never allow Bighorn Sheep to live on Bitter Creek. The sheep industry should not be penalized just because someone wants to plant Bighorns.	Comment noted. However the commenter does not provide any additional information or explanation to substantiate the assertion regarding elk and bighorn sheep.	
Cripple Cowboy Cow Outfit	O-30	WF53	While making fish transplant plans, remember that Bitter Creek has gone dry 3 times in my lifetime.	Comment noted.	
Vermillion	O-33	WF175	The RMP adopts a number of onerous timing and	Comment noted.	

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Ranch Limited Partnership		(R-WF1)	surface use restrictions to protect wildlife habitat. These restrictions apply to big game animals, that are numerous and highly adaptable. The RMP would afford protections similar to those for species listed under the Endangered Species Act (“ESA”), when there is no basis to assume that these wildlife are under threat. In addition, wildlife are not subject to rangeland health standards, despite BLM rules and policy, that require reductions when wildlife use interfere with maintaining, meeting, or making progress towards meeting applicable rangeland health standards.		
Vermillion Ranch Limited Partnership	O-33	WF176 (R-WF2)	The RMP needs to provide additional data regarding wildlife and big game populations and their impacts on resources. Other data suggest that wildlife numbers, especially elk, mule deer, and antelope, have increased over the life of the plan and continue to trend upward. Livestock numbers have decreased or remained stable in a few areas. Thus, the RMP must ensure that any forage decisions respect livestock grazing rights and do not create new resource conflicts.	The current status of wildlife and fisheries resources is discussed in Section 3.19 and its subsections. The impacts of wildlife and fisheries management decisions on other resource programs are discussed by resource in Chapter 4. Forage allocation decisions are outlined in Table 2.1.6 (Forage All Locations) of the PRMP/FEIS. See also Appendix L).	
Vermillion Ranch Limited Partnership	O-33	WF177 (R-WF3)	The RMP fails to document or support the “crucial winter or other big game” habitat. It is not clear where UDWR has updated or expanded these areas as well as what is the scientific basis for such classifications. BLM cannot abdicate its public land management responsibilities to UDWR and must ensure that UDWR objectives are consistent with other multiple uses and resource objectives.	As stated in the introduction to Section 1.5, the PRMP pre-planning process involves the identification of issues and resource use conflicts identified by federal, state, and local agencies (and other stakeholders). Also see the text in Chapter 1 entitled “Utah Division of Wildlife Resources (DWR) Wildlife Habitat Classification System Change.	
Vermillion Ranch Limited Partnership	O-33	WF178 (R-WF4)	Modify statement by adding bolded language and deleting the strikethrough language: “reassessment of big game numbers, herd population trends and forage allocation consistent with the habitat	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate.	

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			<p>carrying capacity and achievement or maintenance of rangeland health standards;</p> <p>establishment of thresholds for disturbance that could be accommodated without significant impacts to wildlife populations...”</p> <p>There is no scientific basis for the premise in the draft RMP that “disturbance” of any kind adversely affects populations or viability of big game animals. This assumption is counter-intuitive since UDWR sanctions hunting of all of these animals, an equally disturbing, and often fatal, experience.</p>	<p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF179 (R-WF5)	<p>Modify statement by adding bolded language and deleting the strikethrough language:</p> <p>“...consideration for reintroduction or transplants of native fish and wildlife species into the planning area that were not addressed during the previous planning efforts, consistent with state, local, and tribal government plans, programs, and policies; including allocating AUMs, where appropriate...”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF179A (R-WF5)	Reintroduction should not take AUMs from livestock operators and should be consistent with local and tribal land use plans.	See comment response WF44.	
Vermillion Ranch	O-33	WF180	Modify the following statement indicated by the bolded	The BLM declines to make the suggested wording changes for a variety of reasons including but not	

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Limited Partnership		(R-WF6)	<p>additions and strikethrough deletions:</p> <p>“During periods of prolonged dryness or drought, to the extent that If wildlife grazing ungulate populations cannot be sustained due to competition for water and available forage or if wildlife numbers are a factor in the failure to meet or maintain or to make significant progress towards meeting rangeland health standards, and overall animal health is compromised. BLM would enter into discussions with the Utah Division of Wildlife Resources (UDWR) regarding herd numbers and overall management options to ensure that rangeland health is maintained. BLM may also confer with the UDWR when drought conditions require response combat the effects of drought.”</p>	<p>limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF180A (R-WF6)	<p>Drought should not be the only reason to require BLM to work with UDWR to reduce wildlife numbers. The criteria for initiating discussions with UDWR should not be animal health or sustaining target herd numbers, because this would allow range health to be harmed even if animal health is not. As written this standard contradicts policy that requires reductions of wildlife when they are a factor in not maintaining, achieving or making progress towards rangeland health standards.</p>	<p>Table 2.1.8 (livestock and Grazing Management) of the Prmp/FEIS states that the goals and objectives for livestock and grazing management would comply with the standards for rangeland health, which includes stipulations (see Appendix F) to manage and/or adjust other grazing animal populations, as needed, to meet rangeland standards (item 12).</p> <p>Also, see comment response WF5.</p>	
Vermillion Ranch Limited Partnership	O-33	WF181 (R-WF7)	<p>Modify the following statement indicated by the bolded additions and strikethrough deletions:</p> <p>“Provide, maintain, enhance, and protect habitats for diversity of fish and wildlife species within the planning area so long as consistent with and in conformance</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not</p>	

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			<p>with rangeland health standards... Maintain, restore, enhance, and protect crucial habitats for all fish and wildlife species and restore degraded habitats. Manage for unfragmented blocks of continuous habitat that would provide the life cycle requirements of a variety of wildlife species... Coordinate with UDWR and state, tribal and local governments as well as permittees other partners to accomplish the populations and habitat goals and objectives of current, revised, and/or future big game Herd Management Plans that are consistent with and meet the multiple use goals and objectives of this land use plan and comply with rangeland health standards.”</p>	<p>substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>See comment response WF180.</p>	
Vermillion Ranch Limited Partnership	O-33	WF181A (R-WF7)	<p>Conformance with rangeland health standards is required. 43 C.F.R. §4180.1. BLM must identify the causal factors and make corrections. BLM H-4180-1, III-12 to III-16.</p> <p>This means that if wildlife is a factor in the area not complying, livestock numbers cannot be reduced to make up the difference in forage or habitat. Instead, BLM must ensure reduction in wildlife use. As written, the RMP would preclude or downgrade all multiple uses in favor of fish and wildlife. The standard operates to the detriment of most other multiple uses by elevating game and fish to a highest priority. The criteria for unfragmented blocks of habitat is meaningless since habitat needs vary widely and fragmentation also varies depending on the species. There is no documentation that each of the management species, especially big game, require large blocks of continuous and contiguous habitat. In fact, big game are adaptable, numerous, and hunted.</p>	See comment response WF5. See also Section 4.19.2.5.2.	
Vermillion Ranch	O-33	WF182 (R-WF8)	Modify the following statement indicated by the bolded additions and strikethrough deletions:	The BLM declines to make the suggested wording changes for a variety of reasons including but not	

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Limited Partnership			<p>“Identify species and habitats regulated under the Endangered Species Act (ESA) most in need of conservation... Coordinate with UDWR and other local and tribal governments partners to accomplish the populations...and/or future big game Herd Management Plans assuming that these goals and objectives can be achieved within the existing rights and other statutory direction that are consistent with and meet the goals and objects of this land use plan.”</p>	<p>limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF182A (R-WF8)	<p>Any “need of conservation” needs to be limited to species listed under the ESA. The RMP imposes a level of protection and regulation that is only authorized for species listed under the ESA. The most onerous regulations are developed for game species that are common, numerous, and, in most cases, highly adaptable. The UDWR plans are not equivalent with “species and habitat” in need of conservation. Any state habitat plans must be forage based as well and modified to incorporate existing grazing preference rights and compliance with rangeland health standards.</p>	<p>See comment response SS135.</p>	
Vermillion Ranch Limited Partnership	O-33	WF183 (R-WF9)	<p>Modify the following statement as indicated by the bolded addition:</p> <p>“BLM would consider habitat banking as a method to compensate for habitat loss due to surface-disturbing activities only if it is voluntary and there is a causal connection to the impacts being mitigated.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the</p>	

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				<p>current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF183A (R-WF9)	<p>The RMP needs to conform to the IM on mitigation. IM-2005-069 states that all compensatory mitigation is voluntary. The case law requires a causal connection between the effect to be mitigated and the off-site mitigation. Robertson v. Methow Valley Citizens, 490 U.S. 332 (1989) (holding that the Forest Service did not have to mitigate effects on adjacent private land relating to ski area). The RMP currently promotes buying out grazing permits without regard to the impacts on resource management, the economy, or community.</p>	See comment response WF11.	
Vermillion Ranch Limited Partnership	O-33	WF184	<p>As written, the RMP promotes reintroduction without regard to the merits of a specific proposal. In cases where reintroduced species will use private lands and private resources, such as domestic livestock, reintroduction should not occur with the agreement of the private land owners. Moreover, reintroduction of a species may impose new regulations on landowners, without their consent. One example is the reintroduction of the gray wolf, that is now found in southern Wyoming and eastern Utah, even though the reintroduction was originally limited to the national park and wilderness areas.</p>	<p>As written, the revised RMP is a programmatic planning and NEPA document with a scope that is region-wide, not site-specific. Any proposed action to reintroduce wildlife species would be analyzed under site-specific NEPA processes and documents, including solicitation of comments and concerns from the public, stakeholders, state and federal agencies</p>	
Vermillion Ranch Limited Partnership	O-33	WF184 (R-WF10)	<p>Modify the following statement as indicated by the bolded addition:</p> <p>“Reintroduction of native fish and wildlife species into appropriate habitats would be accomplished through</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p>	

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			coordination with UDWR, counties and interested public through the appropriate public participation process. When reintroduction of a species will result in impacts on private lands, the landowners must also consent.”	<p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF185 (R-WF11)	<p>Modify this statement by adding the bolded language:</p> <p>“After analysis, reintroduction would be made in areas where they do not conflict with livestock or private property rights or where such conflicts are mitigated. Coordination with permittees would be required. When the reintroduced species is subject to the ESA, it will be an experimental nonessential population.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF185A (R-WF11)	Coordination needs to be clearly understood to be consent.	See comment response WF184.	
Vermillion Ranch Limited Partnership	O-33	WF186 (R-WF12)	<p>Modify the following statement as indicated by the bolded additions and strikethrough deletions:</p> <p>“Evaluate the effects of Do not allow surface disturbing</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			activities that would result in adverse impacts to the key life processes of antelope from May 1 through June 30..."	<p>necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF186A (R-WF12)	The RMP fails to provide a scientific basis for these restrictions and clearer limits. As written it would prohibit any activity that in the opinion of one person might lead to an adverse impact. The standard is too broad and too vague. The exception to the standard should not be limited to maintenance of existing facilities, since the level of disruption to build a range improvement would be similar to that to maintain an existing well. Many public land activities should be allowed to continue but would be prohibited as the standard is written.	The statement as written defines the disallowed activities as those having adverse impacts, which presumably would include those related to "the key life processes" of antelope. Additional restriction of the management prescription to mere evaluation of only surface disturbing activities does not meet the management goals of the RMP or provide a mechanism for action.	
Vermillion Ranch Limited Partnership	O-33	WF187 (R-WF13)	-Alternative B [2-48 Forage, Diamond Mountain Locality (Figure 5)] Alternative B reflects national policy.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	WF188 (R-WF14)	<p>-Alternative A</p> <p>Modify the following statement indicated by the bolded additions and strikethrough deletions:</p> <p>"Human Surface disturbances would be avoided within 0.6 mile of a lek...and utility lines would be avoided within 1,300 feet of a lek during breeding season."</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>-Alternative B</p> <p>Modify the similar statements under Alternative B in the same way.</p>	<p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF188A (R-WF14)	<p>The term “human disturbance” is too broad, ambiguous, and unsupported. It should be replaced with “surface disturbance,” which must be specifically defined. The RMP should recognize that the native species found in the planning area are well-adapted to the vegetation and grazing activities that have been historically associated with this region. Any plan for protecting special status species needs to incorporate both prehistoric and historic grazing activities into the habitat management. BLM must also coordinate with applicable tribal, local and state government grouse plans. These plans should be incorporated into the RMP so that the RMP can evolve as knowledge about the sage grouse situation evolves. Analysis of existing research regarding the sage grouse suggests that criteria in the RMP should be reconsidered. The RMP needs to document the science-based research that supports the mitigation measures. This is especially true for the timing and disturbance to leks without regard to whether they are occupied.</p>	<p>Human disturbances to sage grouse are not limited to surface disturbances, or those that could be caused by livestock grazing. The physical presence of humans can constitute a disturbance to sage grouse, particularly during breeding season. The management actions for protection of sage grouse were based on the State of Utah Strategic Management Plan for Sage Grouse (Alternatives A and B), and Connelly's Guidelines to Manage Greater Sage Grouse Populations and their Habitats (Section 4.15.2.5).</p>	
Vermillion Ranch Limited Partnership	O-33	WF189 (R-WF15)	<p>-Alternative C</p> <p>Strike the entire statement of Alternative C beginning with “Connelly’s Guidelines to Manage Sage Grouse Populations and their Habitats...” and ending with “No permanent facilities or structures would be allowed within two miles when possible.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF189A (R-WF15)	Connelly does not find that surface disturbance within two miles is harmful to the sage grouse.	The commenter incorrectly interprets the management action. Connelly recommends that permanent structures not be constructed within 3 km (1.9 miles) of seasonal habitats because they are potential raptor perch sites.	
Vermillion Ranch Limited Partnership	O-33	WF190 (R-WF16)	-Alternative A, Alternative D The RMP does not define surface disturbance. If the term is defined as the actual construction of a road, where vegetation is removed and soil is mixed or removed, this may be reasonable. If the term is used to apply to any activity that scuffs dirt, then it is unreasonable. The RMP fails to document the scientific basis for prohibiting surface disturbing activities along migration corridors.	The EIS text has been revised to include the definition of surface disturbance, in the context of the wildlife and fisheries management actions.	X
Vermillion Ranch Limited Partnership	O-33	WF191 (R-WF17)	-Alternative A [Wildlife and Fisheries] The proposed introduction of big horn sheep is identified for cattle allotments and should not displace existing sheep ranch operations. The Red Creek allotment, however, is about 5 miles from the boundary and may be adversely affected. The RMP needs to make it clear that reintroduction will not occur if it adversely affects existing sheep operations. As written, the RMP implies that BLM could cancel existing permits to reintroduce wildlife and that is inaccurate. 43	<p>This language is already provided for in the proposed RMP. In Table (2.1.26 (Wildlife and Fisheries Resources) under the subsection entitled Management Actions Common to All Alternatives - Reintroductions, it states:</p> <p>“Reintroduction of native fish and wildlife species into appropriate habitats would be accomplished through coordination with UDWR, counties, and interested publics through appropriate public</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>U.S.C. §1752(g).</p> <p>Any re-introduction proposal needs to closely evaluate migration of coyotes and wolves south from Wyoming. It seems likely that introduction would not succeed if coyotes and wolves continue to push south out of Wyoming. The experience in Wyoming shows that wolves have a significant impact on big game numbers (as well as livestock) and push the coyotes into new territory as well. The RMP fails to address this issue.</p>	<p>participation processes. Reintroductions would involve, but may not be limited to, native species such as Rocky Mountain big horn sheep, moose, bison, and Colorado River cutthroat trout, and wild turkey.”</p>	
Vermillion Ranch Limited Partnership	O-33	WF192 (R-WF18)	<p>-Alternative A [Wildlife and Fisheries]</p> <p>Similarly, current numbers of coyotes, bear and mountain lions also impose real limits on the success of any attempted reintroduction. For instance, BLM in southeastern Arizona tried numerous times to reintroduce big horn sheep but they were extirpated in a single season by mountain lions. Before putting people out of business, the RMP needs to realistically analyze the success or failure of the introduction.</p> <p>In general, reintroduction needs to be consistent with state, local and tribal government plans, programs, and policies.</p>	<p>Reintroduction of native fish and wildlife species into appropriated habitats would be accomplished through coordination with UDWR, counties, and interested publics through appropriate public participation processes. Analysis would be conducted prior to reintroductions to determine feasibility.</p> <p>See comment response WF191.</p>	
Vermillion Ranch Limited Partnership	O-33	WF193 (R-WF19)	<p>-Alternative D [Wildlife and Fisheries]</p> <p>Any reintroduction must also consider the effects on valid existing rights. The RMP does not document habitat or effects.</p>	<p>Under section 1.9 of the PRMP/FEIS, it is stated that:</p> <p>“All decisions made in the RMP and subsequent implementation decisions will be subject to valid existing rights.”</p>	
Vermillion Ranch Limited	O-33	WF193A (R-	<p>Habitat improvement would include chaining and removal of fir or piñon / juniper.</p>	<p>The proposed RMP allows for vegetation treatments to be conducted to meet wildlife habitat requirements, including chaining. See Table 2.1.23</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Partnership		WF19)		(Vegetation Resources) of the PRMP/FEIS under the subsection entitled Management Actoins Common to All Alternatives.	
Vermillion Ranch Limited Partnership	O-33	WF194 (R-WF20)	<p>-Alternative A</p> <p>Modify the following statement as indicated by bolded additions:</p> <p>“Surface disturbing activities that would result in adverse impacts to deer and elk within crucial winter range would not be allowed from November 15 to April 30. This restriction would not apply if it is determined through analysis and coordination with UDWR as well as any other state, local, and tribal government that impacts are insignificant or could be mitigated. Factors to be considered would include snow depth, temperature...”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF194A (R-WF20)	<p>The term surface disturbing needs to be defined as recommended on page 5 of these comments. EPCA, Executive Orders and BLM Policy require more detailed analysis and documentation than what is found in the draft RMP with respect to wildlife management conditions and the imposition of overlapping conditions. This standard needs to be limited to surface disturbing activities and to only apply to significant impacts. The RMP must ensure that restrictions have a scientific basis. For example, it is shown that big game become accustomed to incidental uses of a road by motor vehicles or even drilling in the distance. If the activity involves 6 acres out of 18,000 acres it is not a significant activity.</p>	<p>The Glossary of the PRMP/FEIS has been revised to include the definition of surface disturbance, in the context of the wildlife and fisheries management actions.</p>	X
Vermillion Ranch	O-33	WF195	-Alternative D [Book Cliffs]	<p>The commenter does not provide any information or explanations to substantiate the assertions and</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Limited Partnership		(R-WF21)	The oil and gas industry has extensive experience working in big game habitat and there is no credible support for the assumption of long-term ill effects. Big game numbers are high and population trends are upwards. Thus, it is difficult to justify closures that are being proposed in the RMP.	comparisons of impacts on wildlife habitat.	
Vermillion Ranch Limited Partnership	O-33	WF196 (R-WF22)	<p>-Alternative D</p> <p>[Diamond Mountain]</p> <p>The RMP appears to assume that any human interaction causes the animal to leave, if however briefly, thus constituting a "loss of habitat." This is a misuse of the term, since loss of habitat traditionally means the total deprivation of habitat or its conversion.</p> <p>Additionally, the RMP assumes that human interaction that causes an animal to be excited is disruptive and, thus, harmful. If this is the standard, then BLM must prohibit hunting, since that interaction causes the loss of habitat through avoidance and substantial excitement on the part of wildlife. This suggestion is, of course, is ridiculous but no more ridiculous than the premise that human interaction with wildlife will have significant adverse effects.</p> <p>Similarly, the RMP misuses the term habitat fragmentation and needs to adopt and apply the accepted definition.</p>	Alternative D is the current management condition. Credible support for management actions in the Book Cliffs and Diamond Mountain areas is documented in the current RMP for the Vernal Planning Area. Also see comment response WF37.	
Vermillion Ranch Limited Partnership	O-33	WF197 (R-WF23)	<p>-Alternative A</p> <p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>“Limiting upland vegetation utilization by livestock to 50% and 4” stubble height of key herbaceous species measured from the green line 30% riparian vegetation utilization would beneficially improve habitat and wildlife resources. Any benefits may be reduced by wild horse and wildlife use which cannot be readily managed.”</p>	<p>necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>WF197A (R-WF23)</p>	<p>This statement omits the continued grazing of these areas by big game and wild horses. It also discloses that the RMP would only manage livestock, contrary to established policy that requires BLM to make reductions based on causation. Relying solely on utilization without short and long-term monitoring is inconsistent with BLM rules and policy as well.</p>	<p>See comment response WF 127.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>WF197B (R-WF23)</p>	<p>-Alternative D</p> <p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“Unspecified Vegetation utilization by livestock for uplands and riparian areas are set in allotment management and grazing management plans. , and unspecified riparian vegetation utilization would provide less protection to wildlife and fisheries habitat than the other alternatives.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WF197C (R-WF23)	The discussion of Alternative D is inaccurate. It is not possible to assume that current management is providing less protection.	When the proposed alternative management actions (under the action alternatives) are compared to current management (Alternative D), analysis concludes that Alternative D would provide less protection. This conclusion was not based on assumption, but on analyses and comparison of alternatives.	
Vermillion Ranch Limited Partnership	O-33	WF198 (R-WF24)	<p>-Alternative A</p> <p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“Construction activities associated with mineral development may would cause reduction in the AUMs available to wildlife, loss of wildlife and fisheries habitats, and disruption and/or alteration of seasonal migration routes due to the additional construction facilities; indirect impacts include habitat fragmentation and changes in behavior, distribution, activity and energy expenditure that are caused by human disturbance. These impacts are minimal where construction activities are temporary or of relatively short duration and similar to other land uses and activities.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF198A (R-WF24)	<p>The RMP unfairly singles out mineral development even though fire and hunting activities will also result in loss of habitat, disruption, and habitat fragmentation. In short, hunting probably has greater disruptive effect on wildlife than does construction activities which do not directly threaten the wildlife.</p> <p>-Alternative D</p>	The commenter does not provide any information or explanations to substantiate the assertions and comparisons of impacts on wildlife habitat.	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Similarly, most ranch operations can easily adapt to energy development. The impacts on both forage for livestock and wildlife habitat are relatively small. For many ranchers, energy development also provides income for use of private land facilities or access.		
Vermillion Ranch Limited Partnership	O-33	WF199 (R-WF25)	-Alternative A Modify the following statement as indicated by bolded additions and strikethrough deletions: “Designation of SRMAs and byways may in some cases would have long-term beneficial impacts on wildlife and fisheries by limiting surface-disturbing activities; adverse impacts would be produced by increased visitor use and recreational activities.”	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WF199A (R-WF25)	-Alternative D If Alternative D is the same as A, the conclusion makes no sense.	The comparison of Alternatives A and D are made within the context of designating SRMAs and byways. As stated in Section 4.19.2.7, the long-term impacts on wildlife and fisheries populations (both beneficial and adverse) would be similar for Alternatives A and D. The EIS text has been revised to state that the impacts under Alternative D would be "similar" to Alternative A (as it is stated in Section 4.19.2.7).	X
Vermillion Ranch Limited Partnership	O-33	WF200 (R-WF26)	-Alternative A Modify the following statement as indicated by bolded addition:	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>“Stream habitat improvements would help reduce erosion and sedimentation, which would have direct beneficial impacts on wildlife and fisheries resources. Such projects may increase erosion during the construction phase.”</p>	<p>necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF200A (R-WF26)	<p>Upland improvements will also benefit streams by reducing sedimentation and regulating water flows into the streams during runoff.</p>	<p>Stream habitat improvement is described in the context of stubble height and browsing restrictions on riparian and woody plant species. The impacts of construction-type improvement projects were not analyzed in this section (4.19.2.8.1).</p>	
Vermillion Ranch Limited Partnership	O-33	WF201 (R-WF27)	<p>-Alternative A</p> <p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“Wildlife management actions may in some cases would have beneficial impacts by providing habitat and forage for wildlife, expanding wildlife reintroduction efforts, and protecting crucial winter ranges. Wildlife management may adversely affect vegetation and riparian resources when populations exceed habitat capacity.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch	O-33	WF201A (R-	<p>Not all reintroduction efforts will benefit wildlife habitat. For example, increased prairie dog populations to</p>	<p>The commenter does not provide any additional information or substantiation for suggested revisions</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Limited Partnership		WF27)	support the black-footed ferret will have significant and adverse impacts on rangeland vegetation. While this is justified under the ESA, the RMP cannot ignore the damage done and resulting increase in sediment and erosion, loss of native vegetation, etc.	to the EIS analysis and text.	
Vermillion Ranch Limited Partnership	O-33	WF202 (R-WF28)	The RMP discussion should also address changes in big game and wildlife populations and trends. Elk numbers, for example, in this region are reportedly increasing and this upward trend will continue for the next decade. If UDWR has increased its herd objectives that fact is also relevant to the issue of where rangeland conditions are not maintaining or achieving rangeland health standards and the contributing factors.	Section 3.19 in the EIS text has been revised and trend count data added to the section.	X
Vermillion Ranch Limited Partnership	O-33	WF203 (R-WF29)	Strike the words: “and increase habitat fragmentation during the winter period” from the sentence beginning with “UDWR identified that accelerated oil and gas development...”	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WF203 (R-WF29)	The DEIS needs to place the conclusions in the proper perspective. Oil and gas development may displace wildlife but it will not necessarily fragment the habitat, if wildlife can move through an area. For instance, elk might avoid the well site itself but still use the area	The commenter does not provide additional information or substantiation for suggested revisions to the EIS analysis and text.	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			nearby for cover and forage. Elk can easily cross dirt access roads and thus are not prevented from using the adjacent habitat. Big game numbers have increased over the life of the plan, so there is little if any basis to assume a reduced carrying capacity. It is more likely that any issues are due to drought and increased predation. Also there is no distinction between temporary displacement versus permanent habitat loss.		
Vermillion Ranch Limited Partnership	O-33	WF204 (R-WF30)	<p>Modify the following statement as indicated by bolded additions:</p> <p>“The effects of wildlife management decisions on water and soils would be beneficial, long-term, and indirect, by limiting surface development. In many cases, wildlife management decisions will have long-term direct and indirect adverse impacts on water, vegetation, and soil. Most of the wildlife and fisheries management decisions involve seasonal constraints but would not necessarily preclude surface-disturbing activities and other multiple uses, although the cumulative effect may deny access for six to nine months out of the year. The concentration of energy development in a single season or window throughout the VPA will have cumulative adverse effects.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WF204A (R-WF30)	Wildlife management decisions are not uniformly beneficial.	The commenter does not provide additional information or substantiation for suggested revisions to the EIS analysis and text.	
Vermillion Ranch Limited Partnership	O-33	WF205 (R-WF31)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“The only impacts of wildlife and fisheries management</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes</p>	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>decisions upon water and soils that can be seen where they utilize vegetation, especially in riparian areas and spring ranges. While the RMP will preserve measured are the preservation of crucial deer winter range and the reclamation of disturbance within sagebrush habitat, the RMP provides for relatively little management of big game and wild horses with resulting direct and indirect adverse impacts on vegetation cover, soils through trampling and trailing, and harm to riparian vegetation. Reclamation of disturbances within sagebrush habitat would stabilize soils and increase vegetation, thereby benefiting soil productivity by reducing soil erosion and sedimentation in streams. The allowance of new surface disturbance within crucial winter range may would result in indirect, long-term, adverse impacts to water quality and soil productivity and improved forage palatability.”</p>	<p>necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>WF205A (R-WF31)</p>	<p>If wild horse and wildlife numbers are not monitored and controlled, they will cause areas to not maintain or not meeting Utah Rangeland Health Standards. Reclamation may improve forage palatability for both wildlife and livestock.</p>	<p>In Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS, it states:</p> <p>“Maintain, restore, enhance, and protect crucial habitats for all fish and wildlife species and restore degraded habitats. Manage for unfragmented blocks of continuous habitat that would provide the life cycle requirements of a variety of wildlife species.”</p>	
<p>Vermillion Ranch Limited</p>	<p>O-33</p>	<p>WF206 (R-</p>	<p>The RMP is ambiguous when it comes to the definition of surface disturbance and whether the restrictions apply to all activities. The RMP should clearly state</p>	<p>See comment response WF194.</p>	

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Partnership		WF32)	that range improvement projects are not subject to these restrictions and limits.		
Vermillion Ranch Limited Partnership	O-33	WF207 (R-WF33)	Add the following statement at the top of the table: These range improvements are only projected and are not a ceiling.	Table 4.19.8 in the PRMP/FEIS has been revised to add language as suggested for clarification purposes.	X
Vermillion Ranch Limited Partnership	O-33	WF207A (R-WF33)	This clarification is wise given the difficulty with “ceilings” in the reasonable and foreseeable development scenarios.	Neither the RFD nor the estimated range improvements represent a ceiling. Rather, they are used for analysis purposes only.	
Vermillion Ranch Limited Partnership	O-33	WF208 (R-WF34)	Management restrictions in special designations outweigh assumed benefits for wildlife habitat. There is little correlation between visual quality management and wildlife habitat, since the main issue is retaining habitat qualities.	The commenter does not provide any information to substantiate the assertion that visual resource management and wildlife habitat quality are not related.	
Julander Energy	O-34	WF114 (JWF-4)	Effects of mineral development section. Page 4-310 states that it is assumed that all lands would be developed to their full potential. This is necessary but not realistic, but provides the scope of the analysis. Section on habitat fragmentation makes assumption that impacts of oil and gas development are all bad. Conservation assessment acknowledges that impacts may be good or bad but no one really knows, as the definitive research has not been done yet. Refer to Rangle EA for info re: lack of threats to WTPD from oil and gas development.	Comment noted.	
Center for Native Ecosystems	O-38	WF102 (JLR-3)	The RMP must mitigate the impacts of habitat fragmentation. The RMP concedes that many of the proposed activities will further fragment habitat. What is missing is an attempt to mitigate for this. Page 2-37 has a good list of goals for reducing habitat fragmentation from oil and gas development, but there	BLM makes every effort to achieve the goals listed in the RMP. In Table 2.1.26 (Wildlife and Fisheries Resources) of the PRMP/FEIS under the subsection entitled Management Actions Common to all for Wildlife and Fisheries, it states:	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			is no indication that these will be attained. The key verb here is "encouraging" rather than requiring best management practices for reducing habitat fragmentation.	"Reduce habitat fragmentation by requiring oil and gas field development plans and encouraging such activities as well clustering, multiple drilling from a single pad, utilization of existing roads and pipelines, and other measures to minimize surface impacts."	
Center for Native Ecosystems	O-38	WF112 (JWF-2)	Plague monitoring through collection of fleas and testing of prairie dog carcasses should be conducted in areas with suspected prairie dog declines and in all black-footed ferret reintroduction areas. At present, dusting borrows with insecticides is advised in colonies where plague is known to be active. Because existing insecticides are not flea-specific, dusting burrows to limit the spread of plague should be seen as a temporary measure to be applied in areas without significant non-target species concerns.	Measures to address plague would be part of the specific management plan for the Coyote Basin ACEC and would be enacted in cooperation with ongoing research in the area.	
Center for Native Ecosystems	O-38	WF113 (JWF-3)	5 years of disturbance cannot be considered short-term impact to many wildlife and plant species. Time frame is arbitrary and much shorter periods of disturbance are capable of causing long-term nest or lek site abandonment. 5 years of physical disturbance can also make a rare plant site uninhabitable because of long-term changes to soil or because of the loss of viable seed.	Short-term impacts are typically defined as 5 years or less. In Section 4.1.1, the 5-year short-term impact assumption is used, with the note that "assumptions associated with a single issue (e.g., wildlife) are included within the alternative discussion for that issue". This means that, if warranted, other short-term analysis assumptions could be used that do not include the 5-year short-term assumption.	
Enduring Resources	O-40	WF112 (JWF-1)	"Reduce habitat fragmentation by requiring oil and gas development plans and encouraging activities like clustering, multiple drilling from a single pod, use existing roads/pipelines etc to minimize surface impacts." We as an operator are making every effort to minimize surface impacts, and flexibility to meet demands as a consideration rather than a requirement would be	See comment response WF102.	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			appreciated. We also feel that economics play a key role in determining when we can drill multiple lateral wells from one location.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF159 (NWF1)	The greatest risk to wildlife populations in the Vernal Planning Area (VPA) is from habitat fragmentation, which many conservation groups identify as one of the chief causes of lack of population persistence, species rarity and extirpation in the West.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF160 (NWF2)	Hunting and fishing should be managed in a manner that prevents degradation of the ecological integrity of the area.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF161 (NWF3)	Where possible, current uses should be modified to allow for use in deference to the need of habitat to function for wildlife.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF162 (NWF3)	BLM has provided insufficient protections for lands with wilderness characteristics.	The commenter does not provide any additional information or explanation to substantiate the assertion that insufficient protection is proposed for lands with wilderness characteristics.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF163 (NWF4)	Wildlife services (WS) activities are generally restricted in Wilderness/WSAs primarily because BLM Interim Management Policy (IMP) for Lands Under Wilderness Review requires that WS activities must be directed "at a single offending animal" and use of aerial gunning in these areas requires approval from the State Director	Comment noted.	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			of BLM.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF164 (NWF5)	Wilderness/WSAs should not be subjected to large scale chemical and mechanical vegetation treatments.	Wilderness and WSAs, by definition, are managed to maintain and preserve their pristine, natural and undeveloped characteristics. However, section 4(d) (1) of the Wilderness Act mandates that measures may be taken as necessary in the control of fires, insects and diseases within wilderness. Lands that contain wilderness characteristics have been addressed in Alternative E.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF165 (NWF6)	Wilderness and properly protected areas with wilderness characteristics, linked across the Vernal Resource Area, can lead to the realization of many fundamental goals and objectives proposed both by the science of conservation biology and the discipline of resource conservation.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF166 (NWF7)	While preservation of any new Wilderness/ WSAs in the Vernal Resource Area may prevent future human influences from altering natural disturbance regimes, it is particularly key that new or potential wilderness units are joined together with existing protected (or other specially designated) areas like ACECs to ensure that large scale ecological disturbance can proceed naturally. This does not appear to be the case in the RMP.	Wilderness Study Areas (WSAs), wilderness areas, and ACECs are selected or designated based on criteria described in Section 3.14 (e.g., scenic, unique, fragile, rare, recreational, cultural). The criteria are based on laws that stipulate the process for designation, and are not based on the proximity of other special designation areas or areas. Thus, joining areas to ensure large-scale natural processes is beyond the scope of the EIS and of the VPA RMP planning process.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF167 (NWF8)	OHV use can lead to reduced density and diversity of small mammal populations (Bury 1977, BLM 1978, CEQ 1979, Liddle 1997). Often this effect on mammals can be attributed to a reduction in plant diversity, simplification of plant structure, and reduction in ground cover, all of which are results of ORV activity (CEQ 1979). Also, harassment of wildlife may place a considerable energy strain on wildlife, both due to general stress and due to attempts to escape	OHV impacts on all resources were analyzed in the Final EIS. See Table 2.1.22 (Travel – Road and Trails) of the PRMP/FEIS as well as Sections 3.10.2.2 and 4.10.1	

Wildlife and Fisheries

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			harassment (Bury 1977). These impacts should be analyzed in the EIS.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF168 (NWF9)	Other studies have documented the deleterious effects of OHV noise on desert animals (e.g., Brattstrom and Bondello 1983). These impacts should be analyzed in the EIS.	As OHV travel will be restricted to designated routes under all action alternatives, impacts from OHV noise on animals is expected to be negligible and avoidable.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF169 (NWF10)	OHVs can also impact wildlife habitat indirectly through the dispersal of weed seeds that can attach to and ride on OHVs. This impact should be analyzed in the EIS.	The potential impacts of OHV-caused dispersion of noxious weeds and seeds are analyzed throughout the Section 4.16 (Vegetation), Section 4.11 (riparian and wetlands), Section 4.19.6 (wildlife), and in Section 4.20) woodlands.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF170 (NWF11)	BLM catalogues the overwhelming habitat fragmentation already occurring and projected to occur under all of the proposed alternatives, then identifies the activities necessary to reduce the effect of habitat fragmentation. However, these measures do not appear to be implemented in the alternatives or Management Common to All.	See comment responses WF34 and WF 102.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF171 (NWF12)	The DEIS "proposes to open approximately 80 to 100% of available habitat for most wildlife and fisheries managed by BLM to minerals development." The protections offered by the preferred alternative and the other alternatives in the DEIS are not adequate to protect a number of important and rare species and their habitats in the Vernal Resource Area.	The commenter does not provide any information to substantiate the assertion that the management action protection measures are inadequate to protect wildlife in the VPA.	
Wilderness Society, Wild Utah Project, Center for Native	O-46	WF172 (NWF13)	More than one year ago, Wild Utah Project submitted to the Utah State Office of BLM and to a number of field offices the Heart of the West Conservation Plan, a science-based spatial analysis of the relative importance of various wildlife habitat cores and linkages throughout the Heart of the West ecoregion,	BLM considered this document in preparation of the Draft and PRMP/FEIS.	

Wildlife and Fisheries

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Ecosystems			which includes the Vernal Resource Area. This plan should be used in the development of the RMP.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF173 (NWF14)	In addition, Trout Unlimited's report, titled Gas and Oil Development on Western Public Lands: Impacts of Fish, Wildlife, Hunting and Angling ("TU Report"), shows important location of various species and their habitats. The TU Report also provides information necessary for analyzing impacts on wildlife and deciding upon appropriate management.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF174 (NWF15)	In addition to detailing the effects of habitat fragmentation on species found in the VRA, Wildlife At a Crossroads provides suggested management approaches to protect wildlife habitat.	See comment response WF172.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	WF209 (NAT11)	In general, core areas should be managed such that no new permanent roads are built, use of motorized/mechanized equipment and vehicles is prohibited or substantially limited, logging and other tree removal activities are curtailed, and new surface mineral extraction activities avoided if at all possible.	Comment noted.	
Southern Utah Wilderness Alliance	O-47	WF48	No surface disturbing activities within two miles of active sage grouse leks from March 1 to June 15. No surface disturbing activities within one-quarter mile of active sage grouse leks year round. No permanent facilities or structures would be allowed within two miles. Within .5 mile of known active leks, the best available technology should be used to reduce noise, such as installation of multi cylinder pumps, hospital sound mufflers, and the placement of exhaust systems.	A range of alternatives for protecting sage grouse is presented in Table 2.1.21 (Special Status Species) of the PRMP/FEIS.	

Wild Horses and Burros

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State of Utah	G-1	WH27	The State of Utah strongly opposes the Winter Ridge Wild Horse Herd action being proposed by BLM due to impacts to wildlife in the immediate area.	Comment noted.	
State of Utah	G-1	WH28	The analysis of wild horse impacts on wildlife and fisheries on page 4-324 is incomplete and does not address long-term impacts by wild horses on sagebrush steppe vegetation communities and existing riparian areas. The Utah DWR indicates that significant overgrazing of browse (needed by mule deer) occurs annually, especially around water collection ponds, in other areas of wild horse herds. Estimates of the effects of the Ute Tribal wild horses in Agency Draw indicate that a minimum of a 0.5-mile radius on browse damage can be seen around watering sites	<p>The potential impacts of wild horse management decisions on vegetation are analyzed in Section 4.16.2.14.</p> <p>The analysis of potential impacts of wild horse management decisions on wildlife contained in Section 4.19.2.13 has been expanded for the PRMP/FEIS.</p>	X
State of Utah	G-1	WH29	No analysis is included in the DEIS of the impacts of wild horse trespass on state lands adjacent to Winter Ridge.	The BLM is unaware of trespass issues on State lands, so an analysis of this potential impact was not included in the DEIS. See also comment response WH9.	
State of Utah	G-1	WH30	The State of Utah (DWR) has documented three sage grouse leks on Winter Ridge, although no birds have been noted there for the last few years. It is inconsistent for the BLM, a major player in the local Sage Grouse Working Group, to be a proponent of restoring sage grouse habitat to prevent a listing, while at the same time considering a decision that might establish a wild horse herd in an area with three historic lek sites.	See comment response WH17.	
State of Utah	G-1	WH31	State of Utah (DWR) biologists have documented heavy summer and winter use of Winter Ridge by elk. This use has created competition for forage between	Analysis of impacts from competition for forage between elk, livestock, and wild horses has been added in the PRMP/FEIS.	X

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			the elk and the livestock permittee. This impacts of wild horses on available forage in light of this existing competition needs to be analyzed further in the DEIS.		
State of Utah	G-1	WH32	The potential riparian damage caused by wild horses and its impact on the Colorado River Cutthroat Trout Recovery Program for Meadow Creek and the headwater streams in upper Willow Creek has not been sufficiently analyzed in the DEIS.	The potential impacts of wild horse management decisions on riparian areas are outlined in Section 4.11.2.2. The potential impacts of wild horse management decisions on special status species is provided in Sections 4.15.1.2 and 4.15.2.2, as part of forage allocations. The potential impact of wild horse management decisions on soil and water resources is contained in Section 4.13.1.3. The commenter does not identify what is insufficient about the analysis in question.	
State of Utah	G-1	WH33	The proposal to establish a wild horse herd of between 50 and 100 animals on Winter Ridge may countermand the previously agreed upon and funded efforts of the State of Utah, SITLA, and BLM to improve sage grouse habitat there in order to prevent listing of the grouse.	See comment response WH17.	
State of Utah	G-1	WH34	The Wild Horses and Burros Section 3.18 presents information regarding the Hill Creek Southeast/Agency Draw HMA on page 3-121. The UDWR believes the RMP should note that horses freely roam outside the HMA in the Buck Canyon/Bates Knolls vicinity. Wild horse use has negatively impacted range conditions on UDWR lands in and near Chimney Rock and on Willow Creek. The RMP should also note that wild horse use on Winter Ridge and Bonanza has impacted range conditions in sage-grouse habitat.	The BLM has taken action to prevent wild horses from moving up Buck Canyon to the Bates Knolls area. The fence has been built; however, the BLM is waiting for Uintah County to install the cattleguard.	
Bureau of Indian Affairs	G-2	WH1	Wild and feral horses are culturally important to members of the Ute Tribe and their management and AUM allocations should be coordinated with the Tribe.	The BLM already coordinates with the Ute Tribe as part of its ongoing policy regarding sites, areas, and resources of concern to the Tribe. The BLM would continue such coordination under all alternatives in the RMP.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
School and Institutional Trust Lands Administration	G-20	WH43 (AWH-1)	Alternative D is the only acceptable alternative for Trust Lands. There is already conflict and range use issues with the existing "unofficial" wild horse herd. To make this an official HMA would just compound and extend the existing problems.	Comment noted.	
School and Institutional Trust Lands Administration	G-20	WH44 (AWH-2)	In these paragraphs it states that a decision in the 1985 Book Cliffs RMP had been made to remove the herd, but the decision was never implemented. The reason for removal was that it may not be suitable habitat due to elevation. In the paragraph it mentions that fences would be required between the State (Trust Lands) and the BLM.	Comment noted.	
School and Institutional Trust Lands Administration	G-20	WH45 (AWH-3)	Even though there is not an official herd, the Utah trust lands in the area are having large amounts of forage removed by the horses with no compensation for the removal.	See comment responses WH9 and WH17.	
School and Institutional Trust Lands Administration	G-20	WH46 (AWH-4)	The BLM is unable to control the number and the area in which the horses roam. Points in case: 20 years have passed and implementation of a decision still has not happened. On May 10, 2005, Trust Lands staff observed a large group of wild horses on Willow Flats within the main block of trust lands.	Comment noted.	
School and Institutional Trust Lands Administration	G-20	WH47 (AWH-5)	Conflict with the horses already exists and would only increase with Alternative A.	Comment noted.	
School and Institutional Trust Lands Administration	G-20	WH48 (AWH-6)	The area being considered for wild horse herds is not ecologically suitable for the wild horses. This area includes both the Horse Point and Winter Ridge Allotments which have combined 452 AUMs suspended from the grazing permittees due to the lack	See comment response WH35.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			of available forage. Also, according to Appendix L of the RMP, 36.8% of these two allotments is in fair or poor condition which is below acceptable conditions (38,808 acres in good or excellent condition and 22,551 acres in poor or fair condition). The Wild Free-roaming Horse and Burros Act of 1971, Public Law 92-195, Sec. 3(a), states "...The Secretary shall manage wild free-roaming horses and burros in a manner that is designed to achieve and maintain thriving natural ecological balance on public lands... It is questionable that Public Law 92-195 will be met by adding horses to an area already experiencing ecological problems.		
School and Institutional Trust Lands Administration	G-20	WH49 (AWH-7)	The Utah State Trust Lands Administration does not feel it is their obligation or fiduciary responsibility to build fences and other structures to keep wild horses from entering trust lands where they are not welcome.	The RMP does not indicate or imply anywhere in the document that the SITLA would be responsible for constructing fences adjacent to herd management areas. The BLM would construct such fences where they were determined to be necessary or appropriate in lieu of other management actions.	
UBAOG	G-22	WH10	Reintroduction of horses in the Bonanza area is counter to the Uintah County Plan.	Comment noted.	
UBAOG	G-22	WH11	The counties are opposed to the establishment of an HMA and the placement of horses in Winter Ridge. Strike all in Alternative A & B in this section and replace it with "same as Alternative D". Previous analysis and RMP discussed the unsuitability of Winter Ridge for wild horses. Draft AMSs for this RMP discuss and support the decisions in the 1985 RMP that the horses must be removed. Some of those concerns are contained in the current AMSs although some were dropped, such as limitations on using aircraft for gathers, as much of HA HML is within the Winter Ridge WSA. Another consideration is location. Winter Ridge is a remote location and it is questionable how much public enjoyment of this resource there can be. It is	As required by NEPA, the EIS alternatives provide a range of alternatives management actions from which the Vernal FO can select for the FRMP/FEIS. The management actions selected for the final RMP will be consistent with general overall management direction.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			difficult to understand why an HMA is proposed when so much evidence exists that indicates alternative D is the only acceptable and supported choice. Select D as the preferred alternative.		
UBAOG	G-22	WH12	Analysis fails to address impacts to stressed sage-grouse leks and wildlife habitat in the area as well as uncontrolled wild horse grazing on wildlife habitat and rangeland standards.	<p>The potential impacts of wild horses on wildlife and vegetation are outlined in Sections 4.19.2.13 and 4.16.2.14, respectively.</p> <p>See also the comment response WH28.</p> <p>The potential impacts of management decisions on sage grouse are outlined in Table 4.15.1.</p>	
UBAOG	G-22	WH13	Change title to Herd Protected Occurrence Area. Figure 33 does not reflect alternatives A, B, C, D as other maps do. The difference between a herd protected occupancy area and herd management protected occupancy would then be clear as would the affect of each alternative. The Uintah County Plan provides that management is not to be extended beyond the boundaries of a proposed action unless it is fully analyzed in the planning document.	<p>The legend at the bottom of the map (Figure 33) gives the definition of what they are.</p> <p>The boundaries would only change in Alternatives A and C which are analyzed.</p>	
UBAOG	G-22	WH14	Strike this entire alternative. This alternative says the permits would be offered on the former HMA of Hill Creek. Neither the text nor maps indicate where this is. Issuing this permit would only add to the management problems in the HMA.	Only Alternative B would authorize permits for wild horse grazing in the Hill Creek HA, and these permits would only be issued to the Northern Ute Tribe. Figure 33 has been revised to show the Hill Creek Herd Area in question.	X
UBAOG	G-22	WH15	The Uintah County Plan requires that the horses be gathered periodically.	The BLM is aware that there are specific County and State plan decisions relevant to aspects of public land management that are discrete from, and independent of, Federal law. However, the BLM is bound by Federal law. The FLPMA requires that the development of an RMP for public lands must be coordinated and consistent with County plans, to the maximum extent possible by law, and	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				<p>inconsistencies between Federal and non-Federal government plans be resolve to the extent practical (FLPMA, Title II Sec. 202 (c)(9)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p> <p>Thus, while County and Federal planning processes, under FLPMA, are required to be as integrated and consistent as practical, the Federal agency planning process is not bound by or subject to County plans, planning processes, or planning stipulations. The BLM will identify these conflicts in the FEIS/PRMP, so that the State and local governments have a complete understanding of the impacts of the PRMP on State and local management options. A consistency review of the PRMP with the State and County Master Plans is included in Chapter 5.</p>	
UBAOG	G-22	WH16	This alternative proposes extending the HMA. This extension is not shown on the maps. The Counties object to any extension of a HMA.	The proposed expansion is shown on Figure 33 as the diagonally-hatched area to the north of solidly-shaded the Hill Creek parcels.	
UBAOG	G-22	WH17	The RMP does not address or fully discuss the wild horse management issues, such as impacts on vegetation, other wildlife species, and private property rights.	Impacts from wild horse management decisions on other resources are discussed in Chapter 4 for each resource for which an impact is potential. Specifically, impacts from wild horse management decisions on vegetation and other wildlife are discussed in Sections 4.16.2.14 and 4.19.2.13, respectively.	
UBAOG	G-22	WH18	The RMP and DEIS discussion of wild horse management is deficient. It entirely omits the significant and ongoing resource damage caused by unmanaged wild horse use. It also omits the fact that BLM failed to manage horses within the AML's thus	Herd management, monitoring, and gathering plans would be developed under all alternatives and would provide for the gathering of horses to manage herd sizes, test health, and address conflicts as needed.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>contributing to resource damage. More importantly BLM must ensure that wild horses numbers do not interfere with attaining rangeland health standards. The combined effects of drought and excess wild horse numbers are also omitted. The RMP also omits the fact that tribal and local governments sued to enforce wild horse numbers and that there is no local support for the Winter Ridge Herd Area to be converted to an HMA. In these circumstances, BLM needs to provide for limiting horse numbers to AML and to removing wild horses elsewhere. Wild horse numbers increase rapidly and probably more than any other non-domestic species. Thus it can be a significant factor in rangeland resource degradation.</p>		
UBAOG	G-22	WH19	<p>The provision for a herd projected occurrence area implies horses will be permitted on land outside the HMA. This is contrary to BLM rules and direction.</p>	<p>An occurrence area is land that is not fenced but has the natural boundaries to contain the wild horses from moving any further out side of the HMA, thus allowing the BLM to contain within and prevent wild horses from leaving the HMA.</p>	
UBAOG	G-22	WH3	<p>BLM has admitted and demonstrated a lack of ability to manage and control wild horse population in the VRA and throughout the West. Alternatives that propose the establishment or expansion of an HMA must contain a provision that implementation will not take place until such a time that resources are available to provide proper management of these areas, and that wild horse population can be controlled. The Counties oppose any establishment or expansion of wild horse herds.</p>	<p>The RMP is based upon the assumption that sufficient resources would exist for the BLM to implement proposed management actions, including such things as the establishment and control of wild horse herds.</p>	
UBAOG	G-22	WH4	<p>In the draft there are provisions to assign AUM's to wildlife and wild horses without any discussion of where the AUM's will come from or that adequate forage even exists. The impacts must be analyzed and disclosed.</p>	<p>Table 2.1.6 (Forage – All Localities) of the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, discusses the allocation and reallocation of forage/AUMs between livestock, wildlife, and wild</p>	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				horses. Impacts for forage/AUM allocation are discussed in Sections 4.7.2.2, 4.18.2.3, and 4.19.2.3.	
UBAOG	G-22	WH5	<p>After 1st sentence use would be allowed within allocations made in the land use plan, and overall herd numbers would be confined to management limits established as an appropriate management level. Add:</p> <p>"BLM would remove wild horses when appropriate management levels are exceeded or when wild horses are found outside the herd management areas."</p> <p>The RMP needs to commit to removal and active management of wild horses.</p>	<p>Table 2.1.1 (Management Common to All Alternatives) of the PRMP under the subsection entitled Fire, Drought, and natural Disasters has been revised to read as follows:</p> <p>"Wild or feral horses will be gathered and removed. Forage allocation has been allocated until removal."</p>	X
UBAOG	G-22	WH6	Strike the words "the land use plan" and replace with "this plan".	See comment response WH5.	
UBAOG	G-22	WH7	The stigma of EIA within the local wild horse population has already had a drastic effect upon the domestic horse market. Further, the mixing of wild horses and domestic horses at auctions or in the local community for adoption heightens the potential for transfer of EIA to domestic horses which also impacts the market for domestic horses. Additional costs associated with testing and proof of health certificates are experienced by local horse owners when trying to race, sell, or use their horses outside of the local areas.	Wild horses that are gathered in the Uintah Basin are tested for EIA before they can leave the trap site. All wild horses brought to Vernal and the surrounding areas have a negative Coggins Test for EIA and are current on all vaccinations. The cost of testing for the public is minimal compared to taking the chance of spreading or having EIA.	
UBAOG	G-22	WH8	The only acceptable alternative here is Alternative A. Alternative D proposes a planned amendment involving introduction of horses in the Bonanza area would be implemented. Previous court cases and documented impacts from past over-grazing by horses which are supported elsewhere in the text would indicate the reintroduction of horses to this area is unacceptable.	Comment noted.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			Currently BLM has expressed concern regarding the condition of these ranges with respect to cool season grass species. The text indicates that these declines are associated with past wild horse grazing.		
UBAOG	G-22	WH9	There is no analysis of the impacts of reintroduction of wild horses into this [Bonanza] area and the impact that they would have on private lands that are contiguous to this area. There has been a history of such impacts on private lands along the White River and the failure of BLM to properly manage wild horses in that area to prevent such impacts.	The alternatives providing for reintroduction of wild horses in this area are predicated upon the assumption that the BLM would have the resources to establish and manage the herd such that adjacent private landowners suffer no impacts. The FRMP/FEIS allows for the BLM to remove wild horses when and where conditions warrant.	
Uintah, Daggett, and Duchesne Counties	G-25	WH23	There are proposals to expand herd management areas (HMA) and establish an AML in Bonanza Winter Ridge areas. The counties oppose any expansion of HMAs or Wild Horse herds. BLM has demonstrated and stated that they do not have the resources to manage existing herds. BLM has ignored historical problems with unmanaged wild horse problems such as the excess numbers that grazed the Bonanza area unchecked and the contribution of this overgrazing to the current purported problem of loss of cool season grasses in the area.	Comment noted.	
Uintah, Daggett, and Duchesne Counties	G-25	WH24	The expansions of the HMAs are proposed without proper analysis of need, the availability of forage, manageability of impacts on vegetation, soils and riparian areas and impacts on wildlife and their habitats.	The Wild Horse and Burro Act authorizes the BLM to manage Wild Horses on public lands. Table 2.1.25 of the PRMP/FEIS outlines the management goals and measures that would be implemented under the alternatives in order to appropriately manage wild horse herds relative to forage availability and quality. The potential impacts of wild horse management decisions on vegetation, soils, riparian areas, and wildlife are discussed in Sections 4.11.2.2, 4.13.2.2, 4.16.2.14, and 4.19.2.13, respectively.	

Wild Horses and Burros

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Ute Tribe of the Uintah and Ouray Reservation	G-26	WH25	The Ute Tribe does not support Alternatives A and C relative to wild horse management decisions for the Hill Creek Herd Management Area and prefers that the existing program (i.e., Alternative D) continue. However, the Tribe wishes to continue to work with the BLM to find a mutually acceptable solution to the problem of equine diseases and control of the wild horse population.	Comment noted.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	WH26	The Ute Tribe is concerned about the potential for increased competition for forage and habitat between the wild horse population in the Hill Creek HMA and the wildlife and horses on the Reservation. Since game species, such as antelope, deer, elk, bighorn sheep, moose, and black bear, forage on the same vegetation as the wild horses, they would be adversely affected by large populations of wild horses adjacent to the Reservation.	Comment noted.	
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 Bonanza Unit, yet in the Alternatives C and D there are continuing management proposals for that herd.	See comment response WH35.	
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.</p>	

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				Cattle guards would be placed on roads where needed to ensure the integrity of the fences. See comment response WH35.	
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.	
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.	
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	The commenter does not identify what the	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			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.	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.	
Utah Farm Bureau Federation	O-9	WH39 (WHE)	The RMP should note that since the wild horse removal, the resource has shown marked improvement even during difficult drought conditions.	The BLM has not done a vegetation inventory within the Bonanza area since the removal of wild horses, but is starting to gather data for rangeland health standards. At this time, the BLM does not have data to support or refute the commenter's conclusion.	
Utah Farm Bureau Federation	O-9	WH40 (WHF)	The Farm Bureau opposes the Alternative C recommendation for the re-establishment of wild horses on the Bonanza HMA.	See comment response WH35.	
Utah Farm Bureau Federation	O-9	WH41 (WHG)	Alternatives A, C and D cite various limitations to herd size and proposals for maintaining maximums. Historically, this has been less than effective. Herds have grown beyond management levels with little or no agency attention.	Comment noted.	
Utah Farm Bureau Federation	O-9	WH42 (WHH)	BLM should consider different options for dealing with current wild horse populations. Providing an incentive for private harvest through a permit or license process would reduce BLM costs and provide a better option for	Proposed options under the alternatives allow flexibility in the BLM's management of the wild horse populations within the planning area.	

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			the animals.	See comment response WH35.	
Duchesne County Water Conservancy District	O-10	WH2	<p>All localities – Duchesne County supports Alternative B. Duchesne County's General Plan contains the following policies regarding Wild Horses: "At present there are no known feral or wild-horse populations roaming on public lands in Duchesne County. Free-roaming horses on public lands increase the possibility of equine disease among domestic horses. Wild and free-roaming horses rapidly increase in population, cause overgrazing, negatively impact wildlife and livestock, and burden the land managing agency with unnecessary costs. The introduction of wild horses would adversely affect Duchesne County's environment and economy. It is the position of Duchesne County that:</p> <p>a. No forage allocations or permits shall be provided for wild or fugitive horses on public lands in Duchesne County;</p> <p>b. All feral or fugitive horses found roaming on public lands in Duchesne County are trespassing and shall be removed.</p>	The BLM does not manage any wild horse areas within Duchesne County; therefore, the BLM is consistent with the Duchesne County General Plan.	
Vermillion Ranch Limited Partnership	O-33	WH52 (R-WH1)	In general, the DEIS does not adequately address the effects of wildlife (particularly big game populations) and wild horses on rangeland resources or their interaction. The RMP fails entirely to address and disclose the issues relating to the Bonanza HMA and the Winter Ridge herd. These issues have been litigated, BLM has lost and even in this plan, the wild horses would remain. The adverse impacts of wild horses on rangeland resources are well and fully documented. The failure of the RMP to discuss and	Section 3.18.1 outlines the history of litigation and conflict regarding the Bonanza Herd Management Area. Also, see comment response WH50.	

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			disclose these effects renders this portion of the DEIS inadequate.		
Vermillion Ranch Limited Partnership	O-33	WH53 (R-WH2)	Experience in managing wild horses for the last 30 years provides important information regarding their effects on the environment. The wild horses have significant and adverse impacts on the environment which are generally omitted from the RMP. Wild horses are very effective in controlling their territory, establish visible trails, and consume most types of forage, generally eating an entire year's growth at one time. In addition, wild horse herds increase at the rate of 18% to 23% a year, thus making it very difficult to manage wild horse grazing or their numbers.	<p>The impacts of wild horse management decisions are provided under each resource section in Chapter 4 for which impacts are anticipated. They are also summarized in Table 2.5 of the Draft RMP.</p> <p>See comment response WH35.</p> <p>Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 of the PRMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH54 (R-WH3)	The omission of the effects of wild horses cannot be reconciled with the proposal to continue or to allow wild horses in Bonanza or Red Hill. Indeed, based on Uintah County and tribal plans, there should be 0 horses in the Bonanza area and there is no basis to establish or expand horses elsewhere in the RMPs The RMP ignores past legal problems and does not address the inconsistency with local and tribal plans. The final RMP needs to correct these issues to reflect local and tribal government's objectives and to address and mitigate the adverse environmental effects of current wild horse management.	Please see comment responses WH52 and WH53.	
Vermillion Ranch Limited Partnership	O-33	WH55 (R-WH4)	<p>The RMP fails to justify retaining the Winter Ridge herd and it should be terminated, if that is the desire of the tribal and/or local governments. There are three legal standards that apply:</p> <p>(1) wild horse management must not adversely affect maintaining, meeting or making progress towards meeting rangeland health standards;</p>	See comment response WH35.	

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			(2) there must be sufficient numbers to maintain a healthy population; and		
Vermillion Ranch Limited Partnership	O-33	WH55A (R-WH4)	(3) the proposed management must be consistent with local government plans, programs, and policies.	See comment responses PR3 and WH15.	
Vermillion Ranch Limited Partnership	O-33	WH56 (R-WH5)	<p>Modify the bullet item as indicated by bolded additions and strikethrough deletions:</p> <p>“coordinate management of the Hill Creek herd with the Ute Indian Tribe in order to be consistent with tribal and local government objectives and rangeland health standards develop a mutually satisfactory course of action; and...”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH56A (R-WH5)	Both FLPMA consistency and the Utah federal court case do not allow BLM to develop mutually acceptable course of action. The RMP must conform to local and tribal government management objectives, including zero tolerance for wild horses.	See comment responses PR3 and WH15.	
Vermillion Ranch Limited Partnership	O-33	WH57 (R-WH6)	<p>Modify the bullet item as indicated by bolded additions and strikethrough deletions:</p> <p>“adopt goals and objectives for the Winter Ridge herd consistent with Uintah County and Uintah tribal plans,</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			programs, and objectives.”	<p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH57A (R-WH6)	If local governments object to wild horses, then they should be removed.	<p>The BLM will work with local partners and stakeholders to develop the most appropriate management goals and prescriptions that meet the purpose and need of the BLM’s multiple-use and sustainable-yield mandate.</p> <p>See comment responses PR3 and WH15.</p>	
Vermillion Ranch Limited Partnership	O-33	WH58 (R-WH7)	<p>RE the statement “Comprehensive Land Health Standards would apply to all grazing activities...”</p> <p>The RMP needs to include wild horse forage allocations.</p>	See Table 2.1.6 (Forage – All Localities) of the PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WH59 (R-WH8)	<p>Modify the following statement as indicated by the bolded additions:</p> <p>“Use would be allowed within allocations made in the land use plan, and overall herd numbers would be confined to management limits established as an appropriate management level. BLM would remove wild horses when appropriate management levels (“AMLs”) are exceeded or when wild horses are found outside of the herd management areas. BLM would</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p>	

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			also reduce the AML when wild horses are a factor in the area not meeting or maintaining or failing to make significant progress towards meeting rangeland health standards.”	The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WH59A (R-WH8)	The RMP needs to commit to the prompt removal and active management of wild horses. The BLM grazing rules, 43 C.F.R. §4180.1, require BLM to reduce wild horses when an area fails to meet rangeland health standards and the wild horses are a causal factor. H-4180- 1, Ch. III p. 16. Wild horses are a major factor in rangeland conditions and the RMP needs to include the option of reducing wild horse numbers.	See comment response WH57A.	
Vermillion Ranch Limited Partnership	O-33	WH60 (R-WH9)	Modify the following statement as indicated by bolded additions and strikethrough deletions: “Limit wild horses to the defined occurrence area of the Herd Management Area consistent with the respective tribal and local government plans.”	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion. The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect. The suggested change expressed personal opinions or preferences. The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WH60 (R-WH9)	The BLM is already under court order to remove wild horses in the Bonanza area. Uintah County v. BLM, Civ. No. 00-0482J (Sept. 2001). BLM also needs to remove wild horses from the Winter Ridge area in accordance with local policy.	See comment response WH57A.	
Vermillion	O-33	WH61	RE: Alternative D—Modify the following statement as	The BLM declines to make the suggested wording	

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Ranch Limited Partnership		(R-WH10)	<p>indicated by bolded additions and strikethrough deletions:</p> <p>“Alt. D 146,161 AUMs would be allocated for livestock, 9,607 AUMs would be allocated for wildlife, and 0 AUMs 3,360 AUMs would be allocated for wild horses.”</p>	<p>changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH61A (R-WH10)	The litigation and local land use plans preclude any allocation of forage to wild horses.	The statement relative to Alternative D describes existing policy.	
Vermillion Ranch Limited Partnership	O-33	WH62 (R-WH11)	The tribal and county plans provide for 0 wild horses. The RMP cannot allocate forage for wild horses when it is inconsistent with local plans and there is no federal mandate requiring wild horses when not consistent with local land management. The allocation also contradicts the current court order requiring BLM to remove the wild horses. The RMP needs to adopt the zero tolerance for any wild horses.	<p>See comment response WH15.</p> <p>Allocating forage for wild horses is consistent with federal law and public land policy, which supersedes county land use plans and policy.</p>	
Vermillion Ranch Limited Partnership	O-33	WH63 (R-WH12)	<p>RE: the allocation of AUMs to wild horses—</p> <p>The RMP does not address or fully discuss the wild horse management issues. This omission is significant since BLM has been under a court order to reduce wild horse herd numbers and to remove horses. See e.g. Uintah County v. BLM, Civ. No. 00-0482J (Sept. 2001).</p>	Wild horses are discussed in Table 1.25 (Wild Horses) of the PRMP/FEIS, as well as Sections 3.18, and 4.18. The impacts of wild horse management decisions on other resources are discussed under the various resource sections of Chapter 4.	
Vermillion	O-33	WH64	Modify the following statement as indicated by bolded	The BLM declines to make the suggested wording	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
Ranch Limited Partnership		(R-WH13)	<p>additions and strikethrough deletions:</p> <p>“This section describes the affected environment concerning wild horses in the Bonanza Herd Management Area (HMA), the Hill Creek HMA, and the Winter Ridge HMA (HA), as well as outside the HMAs in the VPO.The wild horse objective for the Hill Creek Herd Area is to ensure that “Wild horse habitat will be managed to support desired population levels...” (BLM 1985); this statement must be modified to conform to rangeland health standards and consistency with state, local, and tribal government plans, programs, and policies encapsulates the objectives of management decisions in the new RMP.”</p>	<p>changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS</p>	
Vermillion Ranch Limited Partnership	O-33	WH64A (R-WH13)	<p>The RMP and DEIS discussion of wild horse management is deficient. It omits the number of wild horses outside HMAs and excess numbers of wild horses within HMAs, and significant and ongoing resource damage caused by unmanaged wild horse use. There should be zero horses in the Bonanza area. It also omits the fact that BLM failed to manage horses within the AML's for the HMAs and failed to remove wild horses outside the HMAs. The inability to manage wild horse numbers has contributed to resource damage, which violates BLM rules and policy with respect to range management and local and tribal government plan consistency.</p> <p>More importantly, BLM must ensure that wild horse numbers do not interfere with attaining rangeland health standards. The combined effects of drought and excess wild horse numbers are also omitted. The RMP also omits the fact that tribal and local governments sued to enforce wild horse numbers and that there is</p>	See comment responses WH57A and WH62.	

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			<p>no local support for the Winter Ridge Herd Area to be converted to an HMA. In these circumstances, BLM needs to provide for limiting horse numbers to AML and to removing wild horses elsewhere. Wild horse numbers increase rapidly and probably more than any other non-domestic species. Thus it can be a significant factor in rangeland resource conditions.</p>		
Vermillion Ranch Limited Partnership	O-33	WH65 (R-WH19)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“Within the Bonanza Wild Horse Herd locality, additional forage allocations would be distributed in the following ways:</p> <p>(1) Increase pronghorn use until there are conflicts with sheep; and</p> <p>(2) increase sheep use in accordance with available forage. Wild horse numbers would also be evaluated and adjusted downward to the extent that wild horse use is a causal factor in the area not meeting, not making substantial progress toward meeting or not maintaining Utah rangeland health standards.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH65A (R-WH19)	<p>Wild horse use of range resources has multiple effects, including removal of vegetation, trailing, and territorial interactions with wildlife. Thus, BLM must aggressively manage wild horse numbers and reassess AMLs when the horses either leave the HMA or exceed carrying capacity, in relation to other uses and wildlife. There should be zero tolerance for excess wild horses.</p>	<p>The section of the Draft RMP/EIS to which the comment refers specifically addresses the impact of forage allocations on wildlife and fisheries. Wild horses are addressed separately from wildlife, so including discussion of wild horses here would be inappropriate. The analysis of impacts of forage allocation decisions on wild horses is provided in Section 4.18.2.3.</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
				See comment response WH35.	
Vermillion Ranch Limited Partnership	O-33	WH66 (R-WH15)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“For all of the alternatives, wild horse management decisions would generally have an direct and indirect relationship to impacts upon livestock grazing, mostly in regards to forage availability an interfering with maintaining, meeting, or making substantial progress towards meeting rangeland health standards. In terms of AUMs and categories of use, forage would be managed and designated to livestock, wildlife, and/or wild horses. This, if AUM designation were changed for wild horses, it could affect livestock and wildlife, as well as interfering with meeting rangeland health standards or it could affect wildlife only. See Section 4.22.2.3.1 for specific forage decisions that affect livestock in terms of wild horses. Wild horses in much of the VPA do not move and graze winter range year-long with resulting adverse effects on rangeland resources. Wild horses will consume an entire year’s growth of a plant, which makes the area unavailable for other grazing animals.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH66A (R-WH15)	<p>Wild horse management relates directly and indirectly to livestock grazing and the draft RMP understates the interrelationship. Wild horses eat most kinds of vegetation, thus competing directly with livestock for forage. Wild horses also affect rangeland resources by the way they consume a year’s growth of forage, as opposed to browsing, their utilization of most available forage, their trailing habits, and their territorial habits that tend to occupy water sources. It is highly unlikely that wild horse use would only affect wildlife.</p>	See comment response WH59.	

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Vermillion Ranch Limited Partnership	O-33	WH67 (R-WH16)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“General impacts to livestock grazing from this alternative are project to be primarily the relatively small and often temporary, and readily mitigated, loss of grazing land from the construction of well pads, other extraction facilities and roads, loss of vegetation available for grazing due to surface disturbance in areas associated with extraction activities, and disruption of livestock management practices due to extraction activities.”</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH67A (R-WH16)	<p>Also, the RMP needs to use a similar level of detail when discussing the interaction of wildlife and wild horse management on other resources as is provided in the rest of this section.</p>	<p>Where potential impacts from wildlife and wild horse management prescriptions on other resource programs are anticipated to exist, they are discussed relative to the specific resource under its relevant section in Chapter 4. These impacts are summarized in Table 2.5.</p> <p>Note: Table 2.5 of the Draft RMP has been renumbered as Table 2.2 of the PRMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH68 (R-WH17)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“If forage allocation reductions are necessary to maintain, meet or make significant progress towards or sustain rangeland health in the Bonanza, Diamond Mountain, Book Cliffs (excluding wild horse herd areas), and Blue Mountain localities or the Bonanza</p>	<p>Section 4.19.2.3.1 of the PRMP/FEIS has been revised as follows:</p> <p>“Under Alternative A, if forage allocation reductions are necessary to maintain, meet or make significant progress towards rangeland health in the Bonanza locality AUMs allocated to live stock and pronghorn would be reduced proportionally though pronghorn</p>	X

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			<p>Wild Horse Herd Area, AUMs allocated to big game and wild horses would be reduced proportionately to the role they play with those allocated to livestock. If reductions are necessary in the Hill Creek and Winter Ridge Wild Horse Herd Areas big game and wild horses would be reduced proportionally with AUMs allocated to livestock and wild horses. However, AUMs allocated to pronghorn would not be reduced below 502 AUMs in the Bonanza locality and 239 AUMs in the Bonanza Wild Horse Herd Area locality unless antelope numbers have played a role in the area not meeting rangeland health standards. ... Reductions in forage allocation for wildlife in the Bonanza, Book Cliffs, and Blue Mountain localities would not be specified under the No Action Alternative. There would be no reductions in forage allocation for wildlife in the Diamond Mountain locality on crucial habitat; on non-crucial habitat, allocations would be reduced equally with livestock under the No Action Alternative.</p>	<p>use would not be reduced below 502 AUMs. Alternative A would be more beneficial to wildlife than Alternative D since Alternative A specifies necessary actions when the aforementioned criteria are met.</p> <p>If, however, additional forage is available forage increases would be divided proportionately between livestock and big game with the wildlife AUMs going to pronghorn and deer. In this case, the impacts of Alternatives A and D are approximately the same since both alternatives would provide additional forage for wildlife.”</p>	
Vermillion Ranch Limited Partnership	O-33	WH68A (R-WH17)	<p>If big game or wild horses affect rangeland health they are reduced based on their effect. There is no proportionality unless it is shown that livestock are contributing to the problem. The last sentence is contrary to policy H-4180-1, ch. III. The reference to locality in connection with HMAs should be deleted. Horses outside an HMA must be removed. There</p>	<p>Section 4.19.2.3.1 is specific to the effect of forage allocation decisions on wildlife and fisheries. Wild horses are considered separately from wildlife, and as such, are not discussed in this section. The effects of forage allocation on wild horses are discussed in Table 2.1.6 (Forage – All Localities) of</p>	

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			should be zero tolerance for excess wild horses.	the PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	WH69	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>“If additional forage is available and rangeland health is being sustained, or significant progress is being made towards sustaining rangeland health in the Bonanza, Blue Mountain, and Diamond Mountain localities and the Bonanza Wild Horse Herd Area, additional forage allocations would be divided proportionally between big game, wild horses, and livestock. Additional forage in the Book Cliffs locality (excluding wild horse herd areas) would be allocated 40% to wildlife and wild horses and 60% to restore suspended cattle livestock AUMs. After restoring all suspended AUMs, additional forage would be allocated proportionally between cattle and wildlife. In the Hill Creek and Winter Ridge Wild Horse Herd Areas additional forage would be divided proportionally between livestock, and big game, and wild horses.</p> <p>Wild horses need to be removed from the Winter Ridge area, so no forage should be allocated to horses there. Wild horse numbers need to stay within AMLs and no additional forage should be allocated.</p>	<p>The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:</p> <p>The BLM does not find the suggested changes necessary or appropriate.</p> <p>The suggested wording change does not substantively contribute to or clarify the discussion.</p> <p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WH70 (R-WH18)	Here also the RMP needs to take a position of zero tolerance for excess wild horses.	Section 4.19.2.3.4 of the Draft RMP/EIS specifically addresses the impact of forage allocations on wildlife and fisheries. Wild horses are addressed separately from wildlife, so including discussion of wild horses here would be inappropriate. The analysis of impacts of forage allocation decisions on wild horses is provided in Section 4.18.2.3.	
Ranges West	O-43	WH50	Pg 2-44, Table 2.3 - Alternatives C&D would put wild	See comment response WH35.	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
		(AWH-8)	horses back in the Bonanza HA despite Uintah County's earlier lawsuit.		
Ranges West	O-43	WH51 (AWH-9)	Regarding the past numerous issues and problems with the Bonanza wild horse herd, we strongly object to the biased wording in this 1st paragraph (i.e. "perceived horse management problems"). The county certainly thought these horses were more than a "perceived problem". The horses were indeed a resource health standards problem because of yearlong grazing on seasonal winter range. BLM certainly considers yearlong grazing on winter range by livestock to be a big range health problem (refer to the 2000? affidavit for the county's lawsuit).	See comment response WH35.	

Woodlands and Timber

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State of Utah	G-1	WT1	With respect to Woodlands, it was a little difficult to follow the logic regarding the link between SRMAs and woodland benefit in Table 2.5. Perhaps very brief mention of SRMAs in Section 2.4.19.2, Management Common to All would help.	Table 2.5 of the Draft RMP has been deleted from the PRMP/FEIS. More detailed information about the link between special designations (including SRMAs) and woodland impacts are provided in Sections 4.20.2.4 and 4.20.2.6 of the PRMP/FEIS.	
State of Utah	G-1	WT2	Woodlands and Forest Lands should be managed to control soil erosion to prevent the soil erosion rate from exceeding the tolerable (T) rate as determined through USDA/NRCS. Resources should be managed such that T is not exceeded on vegetated forest lands nor from roadways or road cuts, or from riparian areas within forested lands.	The BLM is planning management of Pinyon/Juniper forested lands through firewood sales, thinning and fire to decrease canopy cover, and increase shrub and herbaceous cover to reduce erosion at levels of tolerable (T) or below. Ponderosa and Douglas Fir areas will be managed for diversity and cover and will get prescriptions for change if erosion becomes a problem. Roads and road cuts will always be a site where (T) will be exceeded during high rain events. Where sedimentation is identified to be a problem, conservation measures will be applied.	
The Nature Conservancy Moab Project Office	O-6	WT4 (LWT-2)	We oppose the removal of pinyon and juniper from areas where it forms woodlands “naturally”. Under no circumstances should ‘old-growth’ P-J stands be removed for other commodity-based resource uses.	Comment noted.	
IPAMS	O-14	WT3 (LWT-1)	Page 4-331 lists all of the disturbed vegetation as woodlands which are a small part of that total.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	WT5 (R-WT1)	Alternative A—Add the bolded language where indicated: “499,620 acres of managed SRMAs would have long-term beneficial impacts to woodland resources but SRMA management would potentially increase the risk of wildfire.”	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following: The BLM does not find the suggested changes necessary or appropriate. The suggested wording change does not substantively contribute to or clarify the discussion.	

Woodlands and Timber

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				<p>The commenter did not provide any rationale why the suggested change is necessary or how the current data and analysis is incorrect.</p> <p>The suggested change expressed personal opinions or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p>	
Vermillion Ranch Limited Partnership	O-33	WT5A (R-WT1)	The RMP cannot assume that SRMA will benefit woodlands when adjacent national forest suffers from pine beetle and fuel loading. Recent fire history shows that the area is ripe for a major wildfire given drought conditions over the last several years.	<p>See comment response WT1.</p> <p>The impacts of SRMAs on fire risk are discussed in Section 4.4.2.4 in the PRMP/FEIS.</p>	