

No Surface Occupancy

Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
PacifiCorp	O-7	NSO1	As depicted on the maps in our Attachment 5 (based on the interpretation of the DRMP and BLM GIS data), there do not appear to be any existing power lines (or potential for future lines) that will cross WSA and non-WSA lands likely to have wilderness characteristics. The final RMP should make clear that designation of these WSAs and non-WSA lands will not preclude PacifiCorp from continued access to existing or potential new facilities.	WSA's are outside the scope of the RMP, and will continue to be managed under IMP. Generally, this means that they must be managed to a non-impairment standard, which precludes new ROW's. Existing ROW's would not be affected by any planning decision. Restrictions resulting from managing non-WSA lands for wilderness characteristics are present only in Alternative E and the proposed plan, which identifies these areas as ROW exclusion areas. Management prescriptions for these areas would prohibit the construction of new facilities, as well as granting of ROW's to access these (non-existent) facilities.	
PacifiCorp	O-7	NSO2	PacifiCorp suggests that new high-voltage transmission lines need to be appropriately separated to reduce the impact of multiple outages including Homeland Security issues.	This comment does not belong in the SE section; it needs to be moved to (I assume) Lands and Realty, and responded to.	

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State of Utah	G-1	PR18	The BLM is required by FLPMA, Section 202(c)(9), BLM regulation 43 CFR § 1601.0-5(c), and Utah Code Section 63-38d-401, et. seq., to consider the planning efforts of local and state governments and make its planning documents consistent with them. The RMP is inconsistent with state and local plans in many instances, which we comment upon as resource-specific issues.	See comment response PR3.	
State of Utah	G-1	PR19	The State of Utah requests that the policies and plans indicated by Utah Code Section 63-38d-401, et. seq., be shown in the listing of other plans to which the RMP has a relationship.	The addition has been made as suggested.	X
U.S. Fish and Wildlife Service	G-12	PR31 (JPR-7)	The document should include the FWS Ouray National Wildlife Refuge as one of the entities with which the BLM will coordinate management in the VPA.	The document will be amended to include the USF&WS.	X
U.S. Fish and Wildlife Service	G-12	PR32 (JPR-8)	The DEIS notes that monitoring and evaluation of the revised RMP will follow a set schedule and will be documented. You should provide specifics regarding the schedule and the evaluation process. For example, you should identify target thresholds that would trigger a change in management or require remedial actions. For monitoring and evaluation regarding the RMP's management affecting listed species and migratory birds, the Fish & Wildlife Service should be part of the process	The specifics of how this will occur will be developed as a part of the implementation phase of the RMP after the issuance of the ROD.	
Uintah, Daggett, and Duchesne Counties	G-23	PR17	A "not to designate" [ACECs] alternative was not provided, which fails the full range of alternatives test.	There is no requirement in NEPA, FLPMA, other federal legislation or BLM policy to examine an exhaustive range of alternatives that represent extremes in proposed options. Rather, law and policy require BLM to consider a reasonable range of alternatives that meet the purpose and need of	

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				the undertaking, which in this case is the purpose and need for the BLM to manage the lands and resources of the Vernal Planning Area (VPA) under a multiple use and sustained yield regime. The BLM is authorized to designate ACECs and other special management areas where the need for such consideration exists. The range of alternatives considered in the RMP provide for anywhere from 165,944 acres to 681,310 acres in ACECs. The BLM believes that this range is sufficient to offer a variety of options for management and still meet the BLM's goal of managing VPA lands for multiple use and sustained yield.	
Uintah, Daggett, and Duchesne Counties	G-25	PR10	The statement at page 4-210, which reads "In the No Action Alternative, a suitability determination would not be made," does not meet the requirements of State law. Utah Code 63-38d-(8)(a)(A) and (B) require that federal agencies conduct all studies of rivers for possible inclusion in the NWSRS completely through the suitability phase.	See comment response PR8.	
Uintah, Daggett, and Duchesne Counties	G-25	PR13	BLM is proposing to manage the area under a non-impairment standard, in violation of state law (U.C. 63-38d-401(8)(c)(i) (ix) and 6(b)) and the settlement in the case of Utah v. Norton.	The range of alternatives contained in the RMP clearly demonstrate that the BLM is allowing multiple uses throughout the planning area to the extent that they are compatible with the goals and objectives of the plan and existing law.	
Uintah, Daggett, and Duchesne Counties	G-25	PR15	The assignment of resources is a legitimate purpose of an RMP. In the RMP assignments of AUMs and a determination of season of use could be made but the proposals here establish dates for permitted use. The process for establishing the dates is within law and regulations cited above (in comment PR87). These alternatives should be rewritten to comply with RMP purposes and law and regulation.	See comment response LG87.	
Uintah,	G-25	PR4	The counties believe that the BLM has not sufficiently	Table 2.1.19 (Special Designation – Wild and	

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Daggett, and Duchesne Counties			divulged the proposed management prescriptions for the river segments discussed in the draft RMP and EIS. BLM Manual Section 8351.32C reads “public notification of protective management shall occur no later than publication and release of the draft RMP, or plan amendment.” This section requires exactly what it says; that the proposed management conditions be discussed in the draft RMP and EIS in order that the effects of the management can be ascertained before the ROD is signed. The information found at pages 4-211 through 4-214 consists simply of general statements of “concerns,” rather than an evaluation of identified impacts, and support for the concerns cannot be found within the RMP.	Scenic Rivers) of the PRMP/FEIS under the subsection entitled Management Common to All Alternatives refers to new classifications and establishes protective measures to prevent impairment of outstandingly remarkable values within line of sight, up to ¼-mile from centerline on each side of the river, not to exceed 320 acres per mile. BLM believes the non-impairment standard would allow for individual proposals to be evaluated on a case-by-case basis, whereas specific management criteria could unnecessarily restrict some proposals.	
Uintah, Daggett, and Duchesne Counties	G-25	PR5	Section 3.14.3.2 and Appendix C contain the VFO’s reasons and rationale for a determination of eligibility for segments of rivers within the VFO. Table 4, page C-11, discusses the identified required “values” for each segment. The Table does not contain the information necessary to demonstrate that the values mentioned are river-related, “outstandingly remarkable,” or significant on a regional basis. The information presented in the table does not satisfy the guidance provided at page 7 of the 1996 Process and Criteria document adopted by the Bureau of Land Management (Utah State Office), the USDA Forest Service (Intermountain Region), and the National Park Service (Rocky Mountain Region), which requires that “in order to determine regional significance of river resources, it is imperative that similar rivers be compared to each other.”	As discussed in Appendix C, a BLM interdisciplinary team used their professional judgment to review all nominations, and in fact all drainages within the planning area, to come up with a list of "potentially eligible" rivers, which were then further scrutinized. Table 4 summarizes the findings of the BLM after a thorough review involving input from outside entities, including cooperating agencies and the public at large.	
Uintah, Daggett, and Duchesne Counties	G-25	PR6	Table 4 does not meet the requirements of the law, or BLM policy; it merely describes attributes that may support designation of the proposed ORVs in general glowing terms. The counties request that the BLM	See comment response PR5.	

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			review these eligibility determinations with the state and local governments, in order to fully explore the rationale for each.		
Uintah, Daggett, and Duchesne Counties	G-25	PR7	On page 2-57, the draft RMP suggests river segments found to be eligible during the current RMP preparation process would continue to be managed to protect their eligibility under the “no-action” alternative, Alternative D. The counties do not believe this is an accurate representation of federal law and does not comply with BLM policy and direction, or State law.	The BLM has broad discretionary authority to manage the public lands. It is BLM's policy (BLM Manual Section 8351.33A) to manage and protect the free-flowing character, tentative classification, and identified ORVs of eligible and suitable rivers. This protection occurs at the point of eligibility determination, so as not to adversely constrain the suitability assessment or subsequent recommendation to Congress. For eligible rivers where a suitability determination has yet to be made, management is addressed on a case-by-case basis as actions involving these rivers are proposed. For rivers determined suitable in the ROD for the Vernal RMP, protection continues and resource allocations (such as VRM, OHV and mineral decisions) that are compatible with such protection are made for the suitable river corridor as part of the decision. Eligible streams not determined suitable will no longer be managed to protect wild and scenic values, but will be managed in other ways according to the plan.	
Uintah, Daggett, and Duchesne Counties	G-25	PR8	Utah Code c63-38d-(8)(a)(A) and (B) require that federal agencies conduct all studies of rivers for possible inclusion in the NWSRS completely through the suitability phase. Alternative D, as represented at page 2-57, is unacceptable and does not meet the requirements of BLM policy or State law since it states that no suitability determinations would be made.	Alternative D is the baseline (the No Action Alternative) against which all of the other alternatives (the action alternatives) are compared, and is the current management direction.	
Uintah, Daggett, and Duchesne	G-25	PR9	The Wild and Scenic Rivers Act and BLM Manual Section 8351 require consideration of characteristics which “do” or “do not” make a river segment a worthy	The information from Appendix C Table 3 relative to the characteristics that do not contribute to or detract a river segment's suitability for WSR	X

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Counties			addition to the NWSRS. Unfortunately, Table 5 only contains a discussion of the “do” characteristics (the ORVs) under the “Consideration” heading. Table 5 fails to acknowledge related information found in Table 3 of Appendix C, which represents some of the “do not” characteristics. For example, information from Table 3 regarding Argyle Creek states “[t]he high percentage of private land adjacent to the stream has resulted in the construction of numerous ranch houses and summer homes in the corridor. A power line parallels the stream for approximately 7 miles.” This information not only caused Argyle Creek to receive a proposed “recreational” classification, but should also be considered relevant to a suitability determination.	designation has been added to Appendix C Table 5. Please note that the information from Table 3 is added in other appropriate sections such as Land Ownership within Table 5.	
Nancy Bostick	I-162	PR40 (PR-A1)	The outline developed during the Book Cliffs CRMP TRT breakout sessions need to be revisited with the suggestions created during that time implemented. Hundreds of hours were spent by volunteers to create a document that reflected an honest attempt to arrive at consensus by diverse group from the local community including conservationists, agency personnel, extractive industry representatives, recreation interests and those concerned about grazing. It appears that much of this information has been largely ignored in favor of extractive industries.	The Book Cliffs CRMP was reviewed and used as a baseline during the development of the alternatives. Alternatives proposed in the initiative were either brought forward or are included in the Alternatives Eliminated From Detailed Analysis (Section 2.4 of the PRMP/FEIS)	
Bill Robinson	I-173	PR11 (PR-B)	The DRMP/DEIS contains no substantive baseline. Generally the baseline for an action in a DEIS is within the affected environment section of the document. The term baseline is not mentioned. It shows that information is not readily apparent if it does exist. It fails to establish a needed baseline with vegetation, riparian and wetland resources, and soil and water resources.	Appendix C Chapter 3 of the DEIS outlines the baseline data for each resource area appropriate to the programmatic nature of the RMP. The sections within Chapter 3 establish the existing condition (the baseline) for the various resources and issues. The use of the term "baseline" is not required.	
Bill Robinson	I-173	PR12	The DRMP / DEIS fails to use the requisite scientific	The commenter does not provide specific examples	

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		(PR-D)	<p>information objectively. The impacts analysis under NEPA is supposed to be objective and unbiased. The document fails to use this level of objectivity in its analysis to determine potential impacts of the actions or alternatives presented, especially with regard to the oil and gas development. The DRMP/DEIS does not hide the issue that significant oil and gas development will occur, with intensity. The BLM's research has shown that where some of the development (especially roads) associated with oil and gas would be constructed that the lands are of such a nature that they will not be able to every properly recover after being used. In essence, some of these adverse environmental effects will be permanent. While it is not our position that oil and gas development should be banned, it is our position that the BLM must comply with the regulations as well as use the best resources possible to evaluate the environmental costs of this type of intensive single use. The BLM should revise the DRMP/DEIS to include the best scientific information possible and then objectively include and analyze such in its planning documents.</p>	<p>of what scientific information exists that would have been more accurate than the information used in the preparation of the DRMP. As such, the BLM cannot address this comment other than to say that the BLM used the best information available to it at the time the RMP was prepared.</p>	
Bill Robinson	I-173	PR14 (PR-E)	<p>The DRMP/DEIS fails to properly implement a monitoring plan for adaptive management. By merely stating that monitoring will occur the document fails to provide any specificity with regards to the essentials of the BLM's monitoring strategy. Without this, the proposed plan lacks teeth for implementation or enforcement. It is also important to note that the DRMP expressly states that adaptive management will be implemented for the areas related to grazing and OHV, but fails to state that adaptive management will be implemented and used with regard to oil and gas development.</p>	<p>Monitoring plans would be developed as a part of the implementation of the final RMP. For oil and gas activities, monitoring plans are based on the site-specific NEPA analyses, which relate back to the objectives in the RMP.</p>	
Bill Robinson	I-173	PR16	<p>The mitigation measures of the DRMP/ DEIS are</p>	<p>Mitigation of adverse impacts must be tailored to the</p>	

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		(PR-F)	inadequate and not in compliance with NEPA. The measures are vague and nondescript. This is especially true with mitigation impacts from oil and gas development. The stipulations are vague and general as well. The DRMP fails to discuss any of the mitigation measures taken or proposed for implementation to reduce the adverse impacts, both permanent and not, to grazing and other multiple-uses on allotments within the VPA. The final DRMP should contain specific discussion and analyses of mitigation measures for the impacts of an action/alternative, the feasibility of such measures, the costs for such, who will bear the burdens of such costs, the adequacy of such measures, etc....	specific details of those impacts and the resources involved in order to be effective. As the RMP is a programmatic document that implements broad management decisions, the individual details of each possible impact on a real-time, on-the-ground basis are not known. Such details become available only at the project-level stage. While the BLM can commit in the RMP to an overarching management philosophy of implementing mitigation when and where appropriate, it cannot outline the specific details of individual impact mitigation without pre-supposing the nature, extent, and exact location of the impact. As such, the details of mitigation are deferred to the project-level stage of NEPA analysis.	
Bill Robinson	I-173	PR21 (PR-G)	The DRMP DEIS is overly generalized and vague rendering the ability to provide substantive public comments as moot.	Comment noted.	
Bill Robinson	I-173	PR22 (PR-H)	The BLM cannot pick and choose which executive orders it seeks to comply with and then discard or disregard the other applicable executive orders. Other orders that should have been included and analyzed would include: 13211 (Energy Effect Analysis); 11644 (Use of ORV on Public Lands); 11988 (Floodplain Management); 12898 (Civil Justice Reform Analysis); 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations); 12630 (Governmental Actions and Interference With Civil Constitutionality Protected Property Right); 13132 (Federalism Analysis) and 12866 (Regulatory Planning and Review). Should also address Small Business Regulatory Flexibility Act, 5 (USC 601-612 and the Small Business Regulatory Enforcement Fairness Act of 1996 and Utah Statute Annotated 63-38d-401 (Planning duties of the planning	<p>The BLM acknowledges that it must comply will all applicable laws, Executive Orders, regulations, and Bureau policies regarding public land management. This is a base assumption of daily BLM operations and, by extension, of the RMP.</p> <p>Under NEPA, an agency must take a 'hard look' at environmental consequences, however, an EIS 'need not be exhaustive to the point of discussing all possible details bearing on the proposed action.'"</p>	

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			coordinator and office).		
Bill Robinson	I-173	PR41 (PR-A2)	The DEIS fails to include sufficient mitigation measures under NEPA.	<p>The RMP/FEIS is a programmatic document that establishes general management approaches, goals, and broad actions governing large-scale land use decisions. Specific mitigation measures must be developed at the stage at which the exact location and nature of probable impacts is known in order to be the most effective (i.e., site-specific mitigation). Mitigation cannot be presupposed in a programmatic document and be expected to be accurate, effective, and feasible over the life of the RMP.</p> <p>NEPA does not specify the nature or extent of mitigation measures that must be included in project planning.</p>	
Bill Robinson	I-173	PR-F	The mitigation measures of the DRMP/ DEIS are inadequate and not in compliance with NEPA. The measures are vague and nondescript. This is especially true with mitigation impacts from oil and gas development. The stipulations are vague and general as well. The DRMP fails to discuss any of the mitigation measures taken or proposed for implementation to reduce the adverse impacts, both permanent and not, to grazing and other multiple-uses on allotments within the VPA. The final DRMP should contain specific discussion and analyses of mitigation measure for the impacts of an action/alternative, the feasibility of such measures, the costs for such, who will bear the burdens of such costs, the adequacy of such measures, etc....	<p>Section 4.7 of the PRMP/FEIS identifies and discusses the potential impacts to livestock grazing from other resource values/uses, included necessary mitigation measures.</p> <p>In general, mitigation measures that are deemed to be necessary are borne by the proponent.</p>	
Dominion Exploration & Production	O-1	PR1	The open house format of the public meeting in Salt Lake City on February 24, 2004, may not have complied with federal law requiring the BLM to afford	The perceived lack of an open forum at the Salt Lake City meetings did not preclude the public from asking questions, submitting comments, or	

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			<p>the public "opportunities to meaningfully participate in and comment on the preparation of plans" (43 C.F.R. § 1610.2(a); see also 40 C.F.R. § 1506.6(a) and 43 U.S.C.A. § 1712(f). The format did not provide for the public to discuss or respond to any comments made by the BLM or others, as per 43 C.R.R. (sic) § 16102(d). Failure to meet the requirements of the legislation cited could result in legal challenges to the document.</p>	<p>discussing issues with the BLM. BLM staff from a variety of specialties and disciplines was readily available to attendees to answer questions, provide clarification, receive comments, and discuss issues as needed. The BLM believes this format met the letter and intent of the relevant legislation.</p>	
IPAMS	O-14	PR2	<p>BLM acknowledges that in the case of "numerous overlapping stipulations, the time frame in which drilling can occur given constraints (drilling window) may be very limited, which could cause adverse impacts." EPCA policy, however, specifically requires BLM to evaluate the continued need for resource related constraints, including multiple overlapping timing stipulations.</p>	<p>The VFO evaluated the continued need for resource related constraints as part of alternative development. During the initial stages of alternative development a review of the two existing plans (Book Cliff RMP and Diamond Mountain RMP) was conducted. Management prescriptions that were duplicative or no longer necessary were not brought forward. The Mineral Potential Report and the Reasonable Foreseeable Development Scenario were considered during this process. As noted in Section 1.12 of the PRMP/FEIS:</p> <p>"...a review was provided outlining existing leasing constraints within the focus areas. Data on proposed and existing leasing constraints specific to the proposed Vernal RMP are provided in the minerals section of the alternatives matrix (Chapter 2)".</p> <p>Layering 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</p>	

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				<p>policies for many different and often competing land uses and to resolve conflicts and prescribe land uses through its land use plans. Multiple-use management requires a balancing of the mandates for separate resource and land use programs. The RMP will include the decisions required for each program, and BLM will ensure that the allowable uses and allocations are compatible and meet the objectives of the selected plan.</p>	
IPAMS	O-14	PR3	<p>BLM asserted that it would “make all possible attempts” to make the management prescriptions as “complimentary as possible” to local land use plans. This statement does not conform to FLPMA which requires the BLM to “assure” that its land use plans are consistent with state and local plans to the extent they conform to federal law. The affected counties have identified numerous inconsistencies with local land use plans, and BLM must address and justify any divergence.</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 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</p>	

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				<p>PRMP with the State and County Master Plans is included in Chapter 5.</p> <p>43 U.S.C. §1712(c)(9) states that the Secretary of the Interior (through the land use plans of the federal agencies under it) shall "coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located." It further states that "the Secretary shall...assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands [and] assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans..." This language does not require the BLM to adhere to or adopt the plans of other agencies or jurisdictional entities, but rather to give consideration to these plans and make an effort to resolve inconsistencies to the extent practical.</p>	
Westport Oil and Gas Company	O-28	PR20	To satisfy NEPA, an EIS must contain reasonably thorough data, information, and analysis supporting the need for the proposed action. A conclusory statement in an EIS, unsupported by empirical or experimental data, scientific authorities or explanatory information not only fails to crystallize the issues, but affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives. The DEIS lacks information and thorough analysis supporting the need for change and omits significant and contradictory scientific data.	<p>The purpose and need for the PRMP/FEIS are outlined in Section 1.3. The analysis of anticipated impacts is discussed, by resource, in Chapter 4 of the PRMP/FEIS.</p> <p>The RMP was prepared using the best available information identified by the BLM. The commenter fails to identify specific examples of "significant and contradictory scientific data" that were omitted from the document or identify better sources of data that the BLM should have used in its preparation of the document.</p>	

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Westport Oil and Gas Company	O-28	PR26 (PR-P)	<p>The Vernal DEIS analyzes the cumulative impacts of reasonably foreseeable actions on riparian resources, vegetation, air quality, soil and water, wildlife, special status species, ACECs, socioeconomics, recreation, livestock grazing, lands and realty, etc., but not minerals management and development. DEIS Sec. 4.22. This glaring omission must be corrected. 40 C.F.R. §1508.14 (economic and social effects are part of the “human environment” which must be considered). The DEIS does not adequately analyze the cumulative effects of the proposed action on mineral development by alternative. Specifically, BLM fails to disclose the total effect of all the stipulations and restrictions imposed on energy development. DEIS 2-87, 4-123- 124. These decisions, at a minimum, restrict the ability to extract mineral resources and, in some cases, even eliminate the potential for extraction of needed mineral resources.</p> <p>The table in the DEIS that depicts the “overall effect of spatial and temporal limitations on energy and mineral development” is limited and therefore totally inadequate. DEIS 4-112. The DEIS needs to discuss and overlay, by alternative, the timing and spatial limitations in combination with other proposed management prescriptions that impact oil and gas development, including VRM, SRMA and ACEC decisions. EPCA policy requires overlays to identify areas of conflict and opportunities for resolving specific issues. IM 2003-233, Attachment 2-1.</p>	<p>The impacts on mineral resources from other resource decisions by alternative are addressed in section 4.8 of the DEIS. Because of the presences of other [non-mineral] critical elements of the human environment, the various alternatives do not allow for unmitigated or unrestricted development of mineral resources and the array of acreages available for mineral development under different categories is summarized by alternative in Table 4.8.1 and graphically displayed on Figures 11 – 18 of the PRMP/FEIS.</p>	
KerrMcGee Oil and Gas	O-29	PR20	<p>To satisfy NEPA, an EIS must contain reasonably thorough data, information, and analysis supporting the</p>	<p>The purpose and need for the PRMP/FEIS are outlined in Section 1.3. The analysis of anticipated</p>	

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Onshore LLC			<p>need for the proposed action. A conclusory statement in an EIS, unsupported by empirical or experimental data, scientific authorities or explanatory information not only fails to crystallize the issues, but affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives. The DEIS lacks information and thorough analysis supporting the need for change and omits significant and contradictory scientific data.</p>	<p>impacts is discussed, by resource, in Chapter 4 of the PRMP/FEIS.</p> <p>The RMP was prepared using the best available information identified by the BLM. The commenter fails to identify specific examples of "significant and contradictory scientific data" that were omitted from the document or identify better sources of data that the BLM should have used in its preparation of the document.</p>	
KerrMcGee Oil and Gas Onshore LLC	O-29	PR26 (PR-P)	<p>The Vernal DEIS analyzes the cumulative impacts of reasonably foreseeable actions on riparian resources, vegetation, air quality, soil and water, wildlife, special status species, ACECs, socioeconomics, recreation, livestock grazing, lands and realty, etc., but not minerals management and development. DEIS Sec. 4.22. This glaring omission must be corrected. 40 C.F.R. §1508.14 (economic and social effects are part of the "human environment" which must be considered). The DEIS does not adequately analyze the cumulative effects of the proposed action on mineral development by alternative. Specifically, BLM fails to disclose the total effect of all the stipulations and restrictions imposed on energy development. DEIS 2-87, 4-123- 124. These decisions, at a minimum, restrict the ability to extract mineral resources and, in some cases, even eliminate the potential for extraction of needed mineral resources.</p> <p>The table in the DEIS that depicts the "overall effect of spatial and temporal limitations on energy and mineral</p>	<p>The impacts on mineral resources from other resource decisions by alternative are addressed in section 4.8 of the DEIS. Because of the presences of other [non-mineral] critical elements of the human environment, the various alternatives do not allow for unmitigated or unrestricted development of mineral resources and the array of acreages available for mineral development under different categories is summarized by alternative in Table 4.8.1 and graphically displayed on Figures 11 – 18 of the PRMP/FEIS.</p>	

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			development" is limited and therefore totally inadequate. DEIS 4-112. The DEIS needs to discuss and overlay, by alternative, the timing and spatial limitations in combination with other proposed management prescriptions that impact oil and gas development, including VRM, SRMA and ACEC decisions. EPCA policy requires overlays to identify areas of conflict and opportunities for resolving specific issues. IM 2003-233, Attachment 2-1.		
Vermillion Ranch Limited Partnership	O-33	PR33 (R-PR1)	The draft RMP and DEIS recognize the existence of county and state plans but do little to incorporate their provisions into the plan to ensure consistency or to address conflicts. In addition, the RMP needs to consider management in the adjacent BLM field offices, and the respective local government plans, policies and programs, such as the Moffat County land use plan and the Sweetwater County Conservation District plan.	The management of adjacent Field Office plans has been accounted for in the development of the RMP. Adjacent county plans were not reviewed in the development of the RMP, as the RMP does not make management decisions for lands within the areas under county jurisdiction. See comment response PR3.	
Vermillion Ranch Limited Partnership	O-33	PR34 (R-PR2)	The State of Utah owns four sections in each township of public land in the planning area. These lands are administered by the School and Institutional Trust Lands Administration ("SITLA") to generate revenues for public schools. The statutory mandate to manage these lands for revenue production also imposes an obligation on BLM to assure access. State of Utah ex rel. Cotter Corp. v. Andrus, 487 F. Supp. 995 (D. Utah 1979). The draft RMP imposes significant development restrictions on the Trust lands without any discussion of the conflicts or justification for not revising the management to reduce these conflicts.	The BLM makes no claims to implementing management decisions on lands administered by the SITLA. Further, the BLM and the RMP recognize valid existing rights, including those of landowners and/or administrators of lands contained or "landlocked" within BLM lands. The BLM recognizes its mandate to ensure access to those lands or to compensate the owners/administrators of such lands when access cannot be maintained. Management actions implemented through the RMP apply only to lands administered by the BLM.	
Vermillion Ranch Limited Partnership	O-33	PR35 (R-PR4)	Modify the following statement as indicated by bolded additions and strikethrough deletions: "While the BLM would not cannot consider designating	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	

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			<p>additional WSAs in this planning process, it can manage the resources to protect those individual components associated with wilderness, such as opportunity for solitude. would consider whether non-WSA lands with or likely to have wilderness characteristics will be managed to preserve some or all of those values with other land management allocations and actions. These allocation management actions may include, but would not be limited to, designation of OHV categories, mineral leasing categories and withdrawals, VRM classes, special recreation management areas, and Recreational Opportunity Spectrum (ROS) classes., and ACECs.</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	PR35A (R-PR4)	<p>As written, the RMP still fails to conform to the State of Utah v. Norton settlement or other case law. An ACEC or special management area cannot be a surrogate for a former “wilderness inventory area.” Unfortunately, many of the proposed SRMAs or ACECs are exactly that and they fail to meet the criteria and policy.</p>	<p>ACECs are not designated by the BLM as surrogates for WSAs or former WIAs. ACECs can only be designated where outstanding and remarkable resource values are present and where such values are under imminent threat of irreparable harm. Types of values that can be considered include, but are not limited to, scenic, fish and wildlife, and natural systems. These values often coincide with WSAs and non-WSA lands possessing wilderness characteristics. As such, there are some instances in which the BLM's proposed ACEC designations overlap with former WSAs and WIAs. SRMAs are designated in a similar fashion, only where special management is needed to maintain desired recreational opportunities. Like ACECs, SRMAs often coincide with lands with wilderness characteristics, particularly in areas like the Vernal Planning Area, where desired recreational opportunities include, but are not limited to, hiking, backpacking, stream/river fishing, etc.</p>	
Vermillion	O-33	PR36	<p>Modify the following statement as indicated by the</p>	<p>The BLM declines to make the suggested wording</p>	

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Ranch Limited Partnership		(R-PR5)	<p>bolded additions:</p> <p>“Assure that counties and others, such as Native American tribes (Tribes) whose interests might be affected have a sufficient opportunity for productive participation in BLM planning and resource management decision-making. Further assure that the RMP is consistent with state, local government and tribal government plans, programs, and policies and work to resolve contradictions.”</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	PR36A (R-PR5)	<p>FLPMA requires that BLM plans be consistent with local governments, unless contrary to federal law. 43 U.S.C. §1712(c)() (9). Thus, consistency should be a keystone consideration.</p>	<p>Please, see comment response PR3 for the rationale behind this. In short, FLPMA requires only that the BLM give consideration to consistency with non-Bureau plans and make an effort to reconcile inconsistencies when practical.</p>	
Vermillion Ranch Limited Partnership	O-33	PR37 (R-PR7)	<p>Modify the following statement as indicated by the bolded additions:</p> <p>“All future ROW applications. . . would be evaluated on a case by case basis. Future ROWs would be consolidated in corridors where reasonable and economically feasible, legally required, or consistent with state, local or tribal plans, programs, and policies.”</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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				adequacy or accuracy of the RMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	PR37A (R-PR7)	The RMP must consider and disclose the impacts relating to the exercise of valid existing rights. This analysis would include but not be limited to, R.S. 2477 rights-of-way, ditch and water rights etc. In addition, BLM must provide access when it is legally required, such as under the Mineral Leasing Act or to in-holdings, 16 U.S.C. §3210(b).	The PRMP/FEIS already recognizes all valid existing rights and the authorities that mandate access across BLM lands. However, as a general rule under FLPMA, the BLM is not required to ensure that its right-of-way designations are consistent with the plans, programs, and policies of state, local, or tribal entities but to make an effort to be consistent with them when practical and to be consistent with federal law. See comment response GC24.	
Vermillion Ranch Limited Partnership	O-33	PR38 (R-PR9)	The RMP needs to address the connected actions occurring in the adjacent field offices in Wyoming and Colorado, as well as the local government plans and policies in those areas. The VFO is not an isolated island and the adjacent land management actions are cumulative actions that need to be addressed in the regional overview and the cumulative effects chapter. The RMP is incomplete by not addressing land use and social and economic issues in Wyoming. As the RMP notes, Daggett County is economically connected to Sweetwater County.	Section 1.10 of the PRMP/FEIS indicates that Sweetwater General Plan (and other county plans adjacent to the planning area in Wyoming and Colorado) would be reviewed as a part of the planning process. These plans were reviewed and considered in the development of the PRMP/FEIS.	
Vermillion Ranch Limited Partnership	O-33	PR39 (R-PR10)	This discussion is not an adequate discussion of consistency. The RMP must conform to the county plans unless legally contradicted. 43 U.S.C. §1712(c)(9). The RMP needs to address when how the RMP is consistent and how it is not. For example, the RMP land locks most of the Utah trust lands, thereby frustrating statutory direction that these lands be managed to maximize revenue. The RMP needs to identify and discuss the conflicts between school trust mandates and proposed management of the public lands and property rights.	See comment responses GC34 and PR70.	

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National Outdoor Leadership School	O-37	PR29 (JPR-3)	We wish to thank the BLM for the deadline extension following the BLM web network shutdown and for the new tools initially offered to help the public navigate this planning process.	Comment noted.	
Enduring Resources	O-40	PR27 (JPR-1)	<p>The DEIS must be consistent with statutory and executive policies that promote oil and gas development:</p> <p>Analysis used through the RMP EIS is not consistent with the National Energy Policy as required in 43 CFR 1610.3-2.</p> <p>To the extent consistent with applicable law, federal agencies are ordered to "expedite their review of permits or take other actions necessary to accelerate the completion of energy related projects (Exec Order 13212).</p> <p>It is the continuing policy of the Federal Government... to foster and encourage private enterprise in...the orderly and economic development of domestic mineral resources (30 USC 21a).</p> <p>Vernal RMP must be analyzed within the context of congressional and presidential energy policy as implemented by the BLM (IPAMS/PLA comments 4/14/2005)</p> <p>Vernal RMP must substantively and procedurally comply with the foregoing direction and policies that require the BLM to promote and facilitate the development of energy resources on public lands. (Robert Glenn, 124 IBLA 104, 108; 1992) and (Ellis Ferguson, 69 IBLA 353 n.2; 1983).</p>	<p>43 CFR 1610.3-2 is entitled Consistency Requirements, which relates to consistency with other resource plans, not the National Energy Policy.</p> <p>The commenter's items numbered 2-5 lack specificity and do not provide the BLM sufficient information to develop a reasoned respond.</p> <p>See comment response PR3.</p>	
Enduring Resources	O-40	PR28 (JPR-2)	The BLM recognizes its policy to consider EPCA information in the planning process and states that EPCA data is incorporated into the DEIS and RFD, and that the data outlining existing leasing constraints is	BLM did review existing lease stipulations and made meaningful changes in developing the RMP. These changes are evident in a comparison of the action alternatives (A, B, and C) against the existing	

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			provided in the minerals section of the matrix. BLM explains that "careful review of this information shows many major inaccuracies of oil and gas stipulations"...but then summarily concludes that the stipulations generally reflect the minimum requirements necessary to protect the resource. How can this be?	management situation (Alternative D).	
Utah Petroleum Association	O-42	PR30 (JPR-5)	The fact that the Vernal plan revision was classified as a time-sensitive plan (TSP) to "timely address" energy resources under EPCA does not allow BLM to merely reference the data on leasing constraints without further evaluation as required by law. While TSP's are indeed to streamline the process, they must still be legally sustainable and all required planning and NEPA steps must be followed. BLM has acknowledged that EPCA policy applied to the land revision and asserted compliance.	Comment noted.	
Southern Utah Wilderness Alliance	O-47	PR23 (PR-L)	While the draft recognizes the wilderness characteristics of far more acreage than is protected in WSA's, it neglects to consider any alternative that would provide meaningful protection of these identified wilderness characteristics. This is in direct violation of NEPA.	NEPA does not require that a no-impact or minimal-impact alternative be considered. Rather, NEPA requires that a reasonable range of alternatives meeting the purpose and need of the undertaking. The BLM is required under FLPMA and BLM policy to manage lands under its jurisdiction for multiple use. The BLM has developed a range of alternatives that balance the protection of sensitive resources, including lands with wilderness characteristics, with legitimate land uses. The proposed RMP's Alternative C restricts uses on a larger number of acres of lands with wilderness and other lands than any other alternative. This alternative includes more areas closed to use as well as more areas subject to timing and controlled surface use restrictions.	
Southern Utah	O-47	PR24 (PR-M)	The DRMP fails to comply with NEPA's requirement to take a hard look at the potential environmental impacts	In designating OHV routes through the RMP, the BLM has selected existing routes that would be	

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Wilderness Alliance			of designating particular routes. The RMP, including the recreation and OHV travel management portion of the plan, must also demonstrate how it will comply with the national goal to minimize damage as defined in EO 11644 and 11989 and federal regulations. Thus, SUWA requests that BLM temporarily close all inventoried routes that have not yet undergone environmental review, analysis, and formal use designation in compliance with the E.O.s and federal regulations.	designated as is, without any improvement, realignment, etc. The BLM believes that the restriction of OHV travel to designated routes under Alternatives A, B, and C represents a significant shift in favor of reducing resource conflicts and degradation and fully meets the spirit and intent of E.O.s 11644 and 11989, which did not call for a prohibition of OHV travel on public lands but merely a careful allowance of it in balance with other uses and resources values.	
Southern Utah Wilderness Alliance	O-47	PR25 (PR-N)	Cumulative impact of oil and gas related developments, added to the impacts caused by other public lands uses, are not adequately analyzed in the DRMP	The impacts of minerals and energy development as well as of the range of reasonably foreseeable future development that could impact lands and resources within the Vernal Planning Area are discussed in Chapter 4, Section 4.8.	

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State of Utah	G-1	RE16	The State of Utah opposes the closing of the Dry Fork Canyon Recreation Area to the shooting of firearms as this would limit hunting opportunities, and existing laws and regulations already prohibit the discharge of firearms near buildings and on roads.	Comment noted.	
State of Utah	G-1	RE17	The UDWR proposes adding an additional recreation management action to the RMP. We encourage the BLM to ensure all developed recreation sites have bear-proof garbage containers and signs warning of the dangers of feeding bears.	The BLM declines to implement the proposal. The BLM may install bear-proof garbage containers in the future based on site specific evaluations. The BLM also will conduct an education program as stated in Table 2.1.13 (Recreation Resource) in the PRMP/FEIS.	
State of Utah	G-1	RE18	The UDWR supports not improving or developing motorized trails (pg 2-52). Frequent and repeated motorized use in critical wildlife habitats may permanently displace animals and fragment habitat.	Comment noted.	
State of Utah	G-1	RE19	The alternatives clearly list surface acres that will be designated as closed, open, or limited with regards to OHV travel. In each alternative, a given number of miles of routes in the "Limited" category is also listed. This is extremely misleading. According to BLM staff, travel planning has yet to be done, and is scheduled for sometime in the next two years. The Draft gives the impression to the OHV user that all the miles noted on the map are designated for OHV use when that is not the case.	As stated in Table 2.1.15 (Recreation – Trail Maintenance and Development), the BLM would make future OHV route adjustments in areas designated as Open and/or Limited based on access needs, recreational opportunities, and natural resource constraints. For purposes of analysis, County travel plan maps were used to identify existing roads and trails. See comment response RE20.	
State of Utah	G-1	RE20	Designated "Open" areas have little if any logical basis. The areas appear to have been randomly selected, and are not bounded by any geophysical feature that would allow an OHV user to readily identify whether or not he/she is indeed within the Open area. The Division would suggest that BLM expand the open	BLM Land Use Planning Handbook, H-1601-1, Appendix C authorizes management to defer delineating a travel management network. Based on this authorization, the travel management plan will be completed within five years of the signing of the ROD for the Final EIS.	

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			areas to the edges of predetermined boundaries. Those boundaries could be natural features (i.e., streams, ledges, washes, etc) or man made (roads, canals, etc).		
Duchesne County	G-9	RE41 (RE-U)	Paragraph 2 line 7: The reference to "unmanaged OHV use" under Alt B is not logical given the data in Table 2.3 and elsewhere indicating that the amount of land open to unrestricted OHV use in Alt B is very similar to Alt A and C (yet "unmanaged OHV use" is not mentioned in the analysis under those alternatives).	The PRMP/FEIS has been revised to remove "unmanaged" from the text in Section 4.10.2.6.2.2.	X
Duchesne County	G-9	RE42 (RE-V)	2nd paragraph: Why is it stated that there would be "minimal management of OHV use" only in Alt B when the amount of acreage open to OHV travel in Alt B is the same as ALT C and less than Alt A" The amount of acreage available in Alt B for limited OHV travel is very similar to that available in Alt A.	This paragraph refers to the minimal level of OHV management under Alternative B in the areas mentioned: White River, Blue Mountain, Fantasy Canyon, Book Cliffs, Browns Park, Red Mountain-Dry Fork, and Nine-Mile Canyon. Under Alternative A, these areas would be designated as SRMAs and would receive a higher level of OHV management. While the total acres for Open, Limited, and Closed OHV use are roughly similar for Alternatives A and B, this paragraph is an analysis of impacts from OHV use on the above-mentioned areas.	
U.S. Fish and Wildlife Service	G-12	RE60 (JRE-15)	We commend the development of recreation guidelines to help achieve and maintain healthy public lands as defined by the Rangeland Health Standards. We recommend development of similar guidelines using the same standards for other surface-disturbing programs.	Comment noted.	
U.S. Fish and Wildlife Service	G-12	RE61 (JRE-16)	We commend the commitment to minimize light and sound. We recommend a similar commitment in the Minerals and Energy Resources section.	Comment noted.	
Daggett County	G-13	RE3	[This page] lists the alternatives for an SRMA in the Brown's Park area. The recreation in the area is almost totally limited to the area along the river corridor. Alternative D, 18,474 acres with VRM III or IV	Comment noted.	

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			is our preference. Historically, the Brown's Park area has been used for ranching, livestock grazing and mining. Recreation has recently been a more common use in the area, but we feel it is important not to forget and to manage for these historical uses.		
UBAOG	G-22	RE10	In the first sentence it refers to the creation of non-motorized trails, horseback riding and hiking in the listed areas. This sentence needs to be rewritten to ensure that it is clear that the intent here is not to create such trails on roads that are RS2477 claims. It is one thing to designate trails in these areas; it's another thing to designate trails over RS2477 claimed roads.	<p>The "Limited" sections within the VPA are located in figures 25-28. Any designations within the limited sections will be done subsequent to the signing of the Final EIS and Record of Decision as part of a Travel Management Plan. This plan will address individual trail designations, and the system of trails will be required to go through the NEPA process.</p> <p>Addressing RS-2477 assertions is beyond the scope of this planning effort. However nothing extinguishes any right-of-way or alters in any way the legal rights the State and counties have to assert and protect RS-2477 rights.</p>	
UBAOG	G-22	RE11	We need to further expand this to include special use permits for commercial operations on BLM ground.	Table 2.1.3 (Recreation Resources) in the PRMP/FEIS has been updated to include SRP information.	X
UBAOG	G-22	RE12	The increase in resource impacts listed here is the best analysis for why the current open areas should be maintained as activity is dispersed over a larger area and is not likely to lead to the increases in OHV use associated with trail systems. The impacts listed here are those that proponents of the trail system say will be decreased by its establishment.	Comment noted.	
UBAOG	G-22	RE4	There is no analysis of need for the closures of	The need to respond to OHV conflicts and	

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			<p>currently open areas. The DEIS/RMP does not analyze or disclose the impacts of massive closures on other public, state, and private lands. This is counter to Uintah County Plan that provides such closures must be based on documented resource damage.</p>	<p>concerns with other resources and other resource users is documented in Section 1.7 (Identification of Issues) in the PRMP/FEIS. OHV and transportation issues were identified during the agency and public scoping process required for preparation of the RMP EIS under NEPA (40 CFR 1501.7). As stated in Section 1.47, the analysis of potential impacts and issues from proposed management actions, and proposed resource objectives and goals are related to the BLM VFO's mandate to fulfill its multiple-use resource management mission. Analyzing the impacts on county, state, and private lands from the closing of OHV trails within the VPA is beyond the scope of the PRMP/FEIS. Site-specific OHV trails designated as Limited or Closed were not identified in the EIS. The impacts of site-specific OHV trail closings would be analyzed under site-specific NEPA processes and documents. Please see Figures 25-28. A wide range of alternatives were considered within the Draft RMP.</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. 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)). As a consequence, where State and local plans conflict with Federal law there will be an inconsistency that cannot be resolved or reconciled.</p>	

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				<p>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. 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 has been included in Chapter 5.</p>	
UBAOG	G-22	RE5	<p>"The Upper Green River from Little Hole to the Colorado state line would limit all surface disturbing activities within line of sight up to one half mile, unless related to recreational infrastructure support."</p>	<p>The one-half mile or line of sight from river center line is identified in Table 2.1.13 (Recreation Resources) under the subsection entitled Management Actions Common to Call Alternatives. This management decision is not part of any proposed Wild and Scenic River segments.</p>	
UBAOG	G-22	RE5A	<p>Strike:</p> <p>"The Upper Green River from Little Hole to the Colorado state line would limit all surface disturbing activities within line of sight up to one half mile."</p> <p>Developed recreation sites would be closed to grazing and surface-disturbing activities not directly related to recreation development.</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>	

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UBAOG	G-22	RE5B	<p>The RMP does not document the 1/2 mile area. A similar designation was held to be unlawful by the Eighth Circuit. To the extent that this coincides with proposed wild and scenic river, as explained elsewhere, the Wild & Scenic Rivers Act does not authorize management of rivers where neither the State nor the Congress has nominated the river segment. BLM's sole authority is to study, it cannot change management in these circumstances. 16 U.S.C. § 1371.</p>	<p>The commenter does not provide any additional information on which 8th Circuit Court ruling is applicable to the comment. It is presumed that the commenter is referring to 16 USC 1271(Wild and Scenic River), not 16 USC 1371 (Marine Mammals Product Importation).</p> <p>The statement in 16 USC 1271 is a policy declaration to preserve selected rivers as free-flowing and "... to protect their immediate environments for the benefit and enjoyment of future generations...and to fulfill other vital national conservation purposes."</p> <p>Furthermore, Section 1283 states that: "... the head of any Federal department or agency having jurisdiction over any lands which include, border upon, or are adjacent to, any river included within the National Wild and Scenic Rivers System or under consideration for such inclusion, in accordance with Section 1273 (a)(ii), 1274(a), or 1266(a) of this title, shall take such action respecting management policies, regulations, contracts, plans, affecting such lands, as may be necessary to protect such rivers in accordance with the purposes of this chapter."</p>	
UBAOG	G-22	RE6	<p>"Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a camp." Hiking in to a camp is not an option for everyone. This is discriminatory to young children, older people and handicapped. There is no analysis of these impacts. They must be addressed.</p>	<p>See comment response RE1.</p> <p>The BLM provides reasonable access for people with disabilities, when applicable.</p>	
UBAOG	G-22	RE7	<p>There is no basis for surface-disturbing activities to be</p>	<p>Comment noted.</p>	

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			limited for everything but recreation infrastructure. Surface disturbance is surface disturbance regardless of purpose. Impacts do not change.		
UBAOG	G-22	RE8	To accomplish this alternative a plan should be prepared with full participation by the public and Counties.	Comment noted.	
UBAOG	G-22	RE9	This is counter to the Uintah County Plan and we feel that Alt B is the only acceptable alternative here.	Comment noted.	
Uintah, Daggett, and Duchesne Counties	G-23	RE14	The work projects described in the AMS and current use in the area would indicate more attention should be directed at recreation management, not values that are currently afforded protection under other law and regulation.	Comment noted.	
Ute Tribe of the Uintah and Ouray Reservation	G-26	RE15	The use of some vehicles, such as motorcycles and all-terrain vehicles (ATVs), may be prohibited on Tribal lands.	Comment noted.	
Dinda Evans	I-1	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p>	

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				<p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Joan & Mark Strobel	I-2	RE2	Off-road vehicle use destroys the visitor experience for any other user group both on the immediate route and within earshot of that route.	Comment noted.	
JP Lee	I-4	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p>	

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				<p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Crista Worthy	I-7	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Donald Lintner	I-13	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Bill Walsh & Shirley Weathers	I-24	RE36 (RE-P)	The SRMA plan for Nine Mile Canyon should at least follow Alt C. OHV traffic should be limited to present routes. It should not be expanded into lower Nine Mile Canyon and Jack Canyon where it could jeopardize cultural resources.	Comment noted.	
Joanna Bettmann	I-34	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All	

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				<p>Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Mary Ann Lewis	I-35	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled	

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				<p>Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Joanna Bettmann	I-36	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.	

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				<p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
John Gray	I-38	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2,1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives,</p>	

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				<p>the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Steve Bremner	I-39	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p>	

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				<p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Ravi Grover	I-40	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands</p>	

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				<p>with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
William Huggins	I-49	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping</p>	

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				that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites."	
Wayne B. Peters	I53	RE13	RE: Figure 27. If your proposal is for more roads than there are in the Southern Utah Wilderness Alliance "Proposed Recreation Spectrum for BLM Vernal Field Office," you need to reduce the amount of roads. There would still be more than enough roads. Also, be careful where you would allow ATVs and motorcycle trail bikes to go.	Comment noted.	
Jean Bennett	I-56	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Fred Swanson	I-68	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Susan Matti	I-87	RE25 (RE-E)	Referring to Red Mountain-Dry Fork Complex: The OHVs are loving the area to death. Your lack of limitation on the area use is just creating roads everywhere. With that comes significant erosion of soils, disruption of the deer and elk habitat and diminished beauty to a unique area. The map on figure 27 indicates that Alt C would close the area to OHV use, but the words on pg. 2-56 state that there would be limited OHV use. Which is it?	For clarification, please compare Figure 24 and Figure 27. The commenter should note that the Red Mountain Dry Fork ACEC boundaries extend beyond the closure indicated on Figure 27.	

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Liz Thomas	I-95	RE26 (RE-F)	ORV routes are located so that there is absolutely 0% of the VFO area farther than 3 miles of a route and approximately 95% of the VFO area is w/in 2 miles of a route. Please reconsider so that there are areas for non-motorized recreation.	Comment noted.	
Tom Groene	I-97	RE27 (RE-G)	No ORV routes open until you've determined that route meets Executive Orders controlling ORVs as well as BLM regulations.	As stated in Table 2.1.15 (Recreation – Travel Maintenance and Development), Section 2.4.14, the goals and objectives for OHV activities for all the action alternatives would comply with the BLM's National OHV Policy. This policy (regulated under 43 CFR 8340) established management areas as either “open,” “limited,” or “closed” to OHV use.	
Steve Chapel	I-101	RE28 (RE-H)	There needs to be ATV trail designations where full size vehicles are not allowed.	Comment noted.	
Steve Chapel	I-101	RE29 (RE-I)	Rather than making dead end routes-make loops by using trail dozer for new construction. In many cases, it is a very short distance.	Comment noted.	
Steve Chapel	I-101	RE30 (RE-J)	WSAs should be treated as multiple use and motorized use should be allowed on existing routes and new trail construction should be allowed.	<p>The BLM must comply with the Wilderness Act. The Act says that wilderness is a place where nature is untrammled by humans and where people are themselves only visitors. It further defines prohibition of certain uses as follows:</p> <p>“Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized</p>	

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				<p>equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.“</p> <p>(The Wilderness Act of 1964, Public Law 88-577, 88th Congress, S. 4 September 3, 1964, Section 4 [c]).</p>	
Betsy Shade	I-107	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Mark W. Belles	I-112	RE31 (RE-K)	Areas open to OHV use should be very limited. Significant expanses of area should be closed to OHV use and the remaining areas should be limited to identified trails and roads.	Comment noted.	
Tom McIntosh	I-113	RE32 (RE-L)	The amount of land closed to ORVs is miniscule compared to land opened to roads and trails. Why not more restrictions on ORV use?	Comment noted.	
Neil O. Miller	I-119	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2.1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p>	

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				<p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Tom and Ann Yuill	I-128	RE1	<p>Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.</p>	<p>OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a</p>	

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				single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”	
Dwayne Rowland	I-133	RE33 (RE-M)	Most baby boomers can only enjoy the beauty of these trails via ATV and wish to also protect the natural back road character of these areas.	Comment noted.	
Ezra Thomas Jones	I-147	RE31 (RE-K)	Areas open to OHV use should be very limited. Significant expanses of area should be closed to OHV use and the remaining areas should be limited to identified trails and roads.	Comment noted.	
Stephen Borton	I-154	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Stephen Borton	I-154	RE34 (RE-N)	Regarding OHV and Travel, I support Alternative C, which protects 366,559 acres.	Comment noted.	
Susan Lefler	I-156	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2,1.1 (Management Common to All	

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				<p>Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Candee Pearson	I-163	RE1	Allowing a 300-foot corridor on either side of designated routes for cross-country travel and camping that will result in OHV use that will be undesirable and unmanageable.	OHV use would be restricted in areas where rangeland or woodlands would be at risk from OHV disturbances, and restrictions would be considered in areas where biological soil crusts could be disturbed (Table 2, 1.1 (Management Common to All Alternatives) under the subsection entitled Fire, Drought, and Natural Disasters 2.1.17 (Soil and Water Resources) under the subsection entitled	

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				<p>Biological Soil Crusts) in the PRMP/FEIS.</p> <p>In Table 2.1.13 (Recreation Resources) in the PRMP/FEIS under the subsection entitled Management Actions Common to All Alternatives, the PRMP clearly states:</p> <p>“Motorized vehicles would be allowed to travel on a single path up to 300 feet from designated routes to access a dispersed camp, except in non-WSA lands with wilderness characteristics and WSA lands. In designated travel route areas, an activity level plan would be used to identify areas suitable for camping that would allow motorized vehicles to travel from those designated routes. BLM would monitor dispersed camping activities and would work with user groups to address adverse environmental conditions if warranted. If use is such that undue environmental impacts are taking place, BLM would close and rehabilitate damaged areas. If monitoring indicates that developed camping is needed, BLM would evaluate the viability of developed campsites.”</p>	
Garry Mott	I-164	RE35 (RE-O)	Finally Alternative C provides the remaining wild country in your planning area the greatest measure of protection from the ravages of OHV use. Even your own State Director acknowledged in a recent Salt Lake Tribune article that the BLM is "playing catch up" with this very damaging recreational pursuit.	See the RPRM/FEIS. Alternative E provides the largest range of protection for lands with wilderness characteristics.	
Laird Fetzer Hamblin	I-169	RE59 (JRE-14)	OHV use is particularly damaging to cryptobiotic soils and vegetation. The use of OHVs should be kept to maintained roads and a few designated trails where it is determined they will not have adverse effects on the	As stated in Table 2.1.17 (Soil and Water Resources) under the subsection entitled Management Actions Common to All Action Alternatives:	

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			environment or wildlife species and where they will not adversely affect non-motorized use of the area.	<p>" Specific activities that would include biological crust considerations would be prescribed fire, post-fire management, invasive weed control, energy development, grazing, OHV use, and range improvement projects. Biological crusts will be considered along with all other resource values in site-specific NEPA analyses."</p> <p>Also, management actions would include identifying and avoiding biological soil crusts.</p>	
Laird Fetzer Hamblin	I-171	RE58 (JRE-13)	EIS lists some adverse effects of recreation and particularly of OHVs on wildlife and wildlife habitat. But does not sufficiently show the adverse effects of recreation and especially of OHVs on wildlife and wildlife habitat. Recreation effects on wildlife is well documented, attached is list of studies and Montana Chapter of Wildlife society has vast bibliography that would aid in the EIS evaluation of recreation impacts. OHV use allows for presence of people in almost all areas of the landscape, enabling for a constant disturbance and harassment of wildlife. The use of OHVs should be kept to maintained roads and a few designated trails where it is determined they will not have adverse effects on the environment or wildlife species.	<p>As stated in Table 2.1.15 (Recreation – Travel Maintenance and Development) in the PRMP/FEIS under the subsection entitled Goals and Objectives, the PRMP/FEIS complies with the BLM National OHV policy (43 CFR 8340), and protects other resources while providing areas for OHV use.</p> <p>The BLM National OHV policy includes trail designation criteria :</p> <p>“...to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, to prevent impairment of wilderness suitability.”</p> <p>The BLM National OHV policy also requires that:</p> <p>“...trails be located to minimize harassment of wildlife and/or cause significant disruption of wildlife habitats. Special attention will be given to protect</p>	

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				endangered or threatened species and their habitats."	
Letitia Kilgrow	I-172	RE43 (ARE-1)	As a home owner I would like to see OHV use constrained to at least 2 miles from any residence. I would also like to see them limited to trails that go somewhere, not allowing them to congregate in a small area, which creates a large dust and nuisance problem and causes severe erosion of the hills.	Comment noted.	
Smokey Rasmussen	I-174	RE44 (ARE-2)	The McFarley Flat Allotment is close to town and receives a lot ORV use, which causes excessive damage to the range. The BLM should confine the ORV use to trails and should place one of the "special study grazing areas" where the ORVs regularly pass to determine the actual impact of the ORV use.	See comment response RE19.	
Jack Dobbins	I-176	RE46 (JRE-1)	No ORV routes should be designated in the Sand Wash area in order to preserve the non-motorized qualities of the Green River.	Sand Wash is proposed as Closed to OHV use under Alternative C.	
The Nature Conservancy Moab Project Office	O-6	RE62 (LRE-1)	It would be useful for the Final RMP to show a table of all of the monitoring obligations to which the VFO is committing, and prioritize them if they cannot all be accomplished.	The BLM declines to provide the monitoring obligation table as suggested. This is beyond the scope of the RMP and is a plan implementation level decision.	
The Nature Conservancy Moab Project Office	O-6	RE63 (LRE-2)	No campgrounds or other developments should be constructed in important habitat for Special Status Species, and camping should be prohibited within 100 feet of riparian areas.	The BLM is required to comply with Executive Order 11988 (1977) for Floodplains/Utah Riparian Management Policy which states that: "No new surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown that (1) there are no practical alternatives or (2) all long-term impacts can be fully mitigated or (3) the activity will benefit and enhance the riparian area."	

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				Table 2.1.21 (Special Status Species) describes the proposed RMP goals for Special Status Species, which includes managing these species and their habitat in such a manner as to conserve and recover these species for de-listing under the Endangered Species Act.	
The Nature Conservancy Moab Project Office	O-6	RE64 (LRE-3)	Mountain bikes should be considered motorized vehicles and restricted, climbing routes near raptor nests should be closed seasonally, base jumping should only be allowed in designated areas, and special events should be limited in number, size, and allowed in areas that can support the traffic.	The commenter does not provide additional information or explain why these activities should be restricted and/or where they should be restricted. As described in Table 2.1.13 (Recreation Resources) of the PRMP/FEIS, Goals and Objectives include managing recreation within the VPA under comprehensive integrated activity level planning. These plans would include recreation use allocations, group size or seasonal limitations, opportunities for dispersed or organized camping (including large events), and establishing limits of acceptable change.	
The Nature Conservancy Moab Project Office	O-6	RE65 (LRE-4)	Adverse effects to riparian areas, soil and water, SSS, vegetation, visuals, fish and wildlife, and woodlands by the 300-ft corridor need to be discussed. Red Wash, 12 Mile Wash and Steinaker Reservoir all contain SSS.	See comment responses RE1 and RE63.	
Duchesne County Water Conservancy District	O-10	RE37 (RE-Q)	DCWCD supports Alt B. Under this alt, 44,181 acres in Nine Mile Canyon would continue to be managed as a SRMA. Duchesne Co. does not support increasing this SRMA to 81,168 acres under Alt A.	Comment noted.	
Howard County Bird Club	O-18	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Maryland Alliance for Greenway	O-21	RE21 (RE-A)	The draft plan is wrong to allow 4800 miles of ORV routes, many of them in proposed wilderness areas and riparian habitat. A more balanced plan is needed,	See comment response RE19.	

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Improvement and Conservation			allowing ORVs on approved routes where increasing ORV traffic will not impair natural wildlife and wilderness values, but excluding them from fragile areas. The plan should also retire many of the redundant ORV routes that have grown up without BLM approval.		
Maryland Alliance for Greenway Improvement and Conservation	O-21	RE22 (RE-B)	Lands should be closed to ORVs unless signs indicate a particular route is open. No cross-country travel should be allowed. Closed routes should be obliterated and revegetated.	Comment noted.	
Maryland Alliance for Greenway Improvement and Conservation	O-21	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Maryland Alliance for Greenway Improvement and Conservation	O-21	RE24 (RE-D)	We urge BLM to use the Heritage Plan as a basis for regulating OHV traffic.	See comment response AT1.	
Vermillion Ranch Limited Partnership	O-33	RE67 (R-AT6)	-Alternative D The SRMA is not adequately justified and should be discontinued.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	RE77 (R-RE6)	Recreation use is a direct, not an indirect effect on riparian resources. The RMP provides for no mitigation from adverse recreation impacts.	The proposed PRMP/FEIS is a programmatic NEPA document that analyses impacts of the proposed management actions under the various alternatives. This level of analysis is necessarily broad in scale. Site-specific impacts of recreational activities on riparian resources would be analyzed under	

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				<p>separate NEPA processes and documents. As described in Table 2.1.13 (Recreation Resources) of the PRMP/FEIS under the subsection entitled Goals and Objectives, it includes managing recreation within the VPA under comprehensive integrated activity level planning. These plans would include recreation use allocations, group size or seasonal limitations, opportunities for dispersed or organized camping (including large events), and establishing limits of acceptable change. Broad mitigation measures are described for riparian resources in Section 4.11.3.</p> <p>Also see comment response RE20.</p>	
Vermillion Ranch Limited Partnership	O-33	RE78 (R-RE7)	The statement that access roads would increase illegal OHV use makes no sense. If the road is open OHV use is lawful. If it is not, it does not follow that a limited access road promotes unlawful activity.	<p>The statement in question does not say that access roads will increase illegal OHV use. Rather, the statement says, "more roads would increase access for illegal OHV use in remote riparian areas." That is, the presence of more roads provides more opportunity for illegal OHV use in remote riparian areas to occur.</p> <p>Under all Alternatives, OHV travel is designated Open-Managed, Limited, or Closed. See Figures 25-28 and 28e in the PRMP/FEIS. Not all open roads are considered designated routes. As such, limited access roads, while not being designated for OHV use, have the potential to attract unapproved OHV use.</p>	
Vermillion Ranch Limited Partnership	O-33	RE78A (R-RE7)	This statement should be deleted.	<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>	

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				<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>	
Outdoor Industry Association	O-35	RE50 (JRE-5)	Draft RMP's stated goals clearly lay out the needs for and BLM's intention to provide protection for recreational resources such as Sand Wash. The oil and gas development proposed under this RMP is in direct contradiction of goals and objectives stated for both Recreation and Visual Resources. BLM should adhere to stated goals and objectives; protect the viewshed and wilderness character of the areas above Sand Wash; protect the Green River Corridor from the sights, sounds and lights from oil and gas development. None of the alternatives does this.	In Table 2.1.18 (Special Designations – Areas of Critical Environmental Concern (ACECs)) in the PRMP/FEIS does provide protection of the Lower Green River for both the Proposed Plan and well as in Alternatives A, C and E. The objective of the ACEC is to protect the high-value scenic resources and riparian ecosystems. The referenced NSO is for line of sight from the center line of the river up to one-half mile along both sides of the Lower Green River.	
Outdoor Industry Association	O-35	RE51 (JRE-6)	BLM must recognize, plan for and manage the vast array of recreational opportunities present in the Vernal FO. The language of the RMP indicates an attitude of resignation to the economic power of oil and gas. This approach states: we have oil and gas reserves other BLM resource areas do not have, therefore we should develop oil and gas. The same can be said for many elements of the ROS offered here-dinosaur remains, world class fishing, archaeological resources, scenic vistas, river corridors, etc). The opportunity for a true ROS exists within the area covered by the draft RMP. Concession to economic value of oil and gas and the	Comment noted.	

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			regional popularity of OHV use weaken or obliterates many components of the ROS.		
Outdoor Industry Association	O-35	RE52 (JRE-7)	Economic value of outdoor recreation is both significant and growing (and must also include travel and tourism numbers). Societal value of recreation also important. BLM's Workplan For The Fiscal Years 2003-2007 recognizes the importance of these elements in its stated goals. Draft RMP fails to recognize or meet these objectives. There are detailed analyses of economic benefits of oil and gas development but none for recreation, with exception of baseline data in No Action Alt. There is a detailed analysis of the detrimental effects of recreation on oil/gas development...but there is no detailed analysis of detrimental effects of oil/gas development on recreation (Section 4.12.4 just says there would be "no unavoidable adverse impacts to socioeconomics" from the projected oil/gas development). 4.12.6 says there are no long term impacts - positive or negative - from oil/gas development, nor are there any irreversible and irretrievable resources. There are likely both positive and negative effects and these should be considered.	In Section 4.12.1 of the PRMP/FEIS, it states: "If impacts to some aspect of the socioeconomic situation are not mentioned in this analysis, then a negligible effect should be assumed." Consequently, it was concluded that the impacts on recreation from oil and gas development would be negligible and therefore no further reporting would be done.	
Outdoor Industry Association	O-35	RE53 (JRE-8)	Draft RMP fails to develop, offer or analyze recreation, participation numbers by categories, type or use or type of experiences desired within the planning areas.	See comment responses RE54 and RE55.	
Outdoor Industry Association	O-35	RE54 (JRE-9)	Draft RMP fails to take into consideration impacts of oil and gas development and widespread OHV use on world-class recreational opportunities that are limited in availability and may be unique to the planning area.	Section 4.10.1 describes the proposed management action impacts common to all alternatives, including those caused by minerals development and OHV use. As a programmatic NEPA document, analyzing the impacts of OHV and minerals development is beyond the scope of the PRMP/FEIS. Site-specific impacts analysis for recreation areas would be conducted through other NEPA processes and documents and through site-	

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				specific or area-specific planning (see Section Table 2.1.3 (Recreation Resources) of the PRMP/FEIS under the subsection entitled Goals and Objectives).	
Outdoor Industry Association	O-35	RE55 (JRE-10)	Draft RMP fails to assess desires and demands on behalf of all recreationists-motorized and non-motorized for protection of scenic vistas and view sheds.	As described in Section 1.7 Identification of Issues, the Draft RMP scoping process provided an opportunity for the general public, local, county, state, and other federal agencies, and other stakeholders to address resource conflicts and questions, and to identify resource issues. Following the public comment period, the BLM analyzed public comments and integrated them into the PRMP/FEIS, as appropriate.	
Outdoor Industry Association	O-35	RE56 (JRE-11)	Draft RMP fails to offer or analyze the benefits and efficiencies from regional recognition and management of natural, cultural, heritage and recreation resources, including: 1) Coordination with other BLM offices on management of the Green and White river corridors to maximize resource protection, recreation and wildlife values; 2) Protection and promotion of natural and recreation values on BLM lands surrounding Dinosaur National Monument to maximize resource protection, recreation and wildlife values; 3) Protection of wilderness, back country, or Primitive, non-motorized recreation opportunities in areas such as Desolation Canyon, Wolf Point, the Book Cliffs and Bitter Creek.	<p>A summary of all consultation and coordination can be found in Chapter 5 of the PRMP/FEIS. Section 5.4 provides a log of meetings and coordination with partners for the development of the Vernal RMP. Coordination with adjacent BLM offices and other federal agencies, including Dinosaur National Monument, was performed throughout both the planning and analysis portions of the revised plan.</p> <p>Please also see the “Dear Reader” letter from the Utah State Director in the front of the Draft RMP:</p> <p>“We would like to particularly recognize the State of Utah and its agencies; Daggett, Uintah, and Duchesne Counties; the Ute Tribe and Bureau of Indian Affairs; and the U.S. Fish and Wildlife Service as cooperating agencies on this DRMP/DEIS.”</p> <p>Also, in Section S-2 of the Executive Summary in the PRMP/FEIS, it states:</p>	

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				<p>"The revised RMP, also referred to as the Vernal Field Office RMP, will coordinate the management of the VPA with other land management agencies and private entities, including: the State of Utah; the National Park Service (NPS); the Forest Service (USFS); the Bureau of Indian Affairs (BIA); Daggett, Duchesne, and Uintah Counties; and municipalities."</p>	
Outdoor Industry Association	O-35	RE57 (JRE-12)	Draft RMP fails to offer management of these same critical areas from the sights and sounds related to oil and gas development. Remote portions of Desolation Canyon currently offer the only respite from the sounds and nighttime illumination of oil and gas development.	Although the Vernal Field Office does not manage for natural sight and sound throughout the VPA, it does identify through land planning decisions those areas where natural sights and sounds are important and should occur; one example is the Lower Green River Visual Corridor.	
National Outdoor Leadership School	O-37	RE47 (JRE-2)	Opportunities for "solitude and primitive and unconfined types of recreation" were not identified as a recreation use to be preserved in the future, even though the draft is supposed to "assure there is a spectrum of recreation opportunities and settings through a comprehensive integrated activity level planning". Specifically the preferred alternative only considers opportunities for unconfined, dispersed, and primitive recreational activities throughout the designation of a Book Cliffs SRMA, of which 90% of the subsurface is currently leased for mineral development.	Proposed Special Designation areas (ACECs, Wild and Scenic River segments), and existing WSAs described in Section 3.14 and Chapter 2 would provide recreational opportunities for solitude, primitive, and dispersed recreation.	
National Outdoor Leadership School	O-37	RE48 (JRE-3)	Other "Recreation Goals and Objectives" listed as common to all alternatives were not translated adequately into management actions. Example 1) Goal: "Continue to implement the 1979 Green River Management Plan for Desolation and Gray Canyons to protect the Desolation Canyon historical landmark within VFO." Why are the historical values of this 1979 plan and their corresponding protective actions partially	Even though the Desolation Canyon Landmark boundaries are identified as "extending along the Green river from Nine Mile Creek in Nutters Hole, in a strip extending one mile either side of the center line of the channel, 45 miles south to Florence Creek" and "The Desolation and Gray Canyons of the Green River Management Plan as an "...average of about one mile in width" (to protect the	

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			perpetuated in the new Vernal draft while the full EIS considerations and visual corridor created at the time neglected?	visual corridor), there are no stipulations, prescriptions, nor maps associated with those documents to identify where those boundaries are. The intent of the boundaries was to protect both natural sights and sounds from the river user. This protection is currently being administered by the Vernal Field Office and will continue with a one-half mile no surface occupancy (NSO) to oil and gas activities along these sections of the lower Green River.	
National Outdoor Leadership School	O-37	RE48A	Example 2) Goal: "All developed recreational sites would be closed to (...) all forms of surface disturbing activities not directly related to recreation development." Doesn't explain how it will limit surface disturbing activities. Without specific spatial boundaries attached to it and placed within the context of other section of the draft referring to oil and gas leasing stipulations across the planning area, we do not believe that statement carries adequate protection.	The Final EIS does not list those sites spatially. However, the sites which have been alluded to in this document refer to those in both the Diamond Mountain RMP and the Book Cliffs RMP which have digitized, mapped and identified in ArcView, thus allowing us to continue to protect these locations with a spatial and legal reference.	
National Outdoor Leadership School	O-37	RE49 (JRE-4)	The draft does not fulfill its goal to adequately review recreation uses and address projected recreation needs. Draft is inconsistent and incomplete in its efforts to "identify special recreation management areas requiring enhanced or special management for recreational uses, or for protection of recreational-related resource values." Specifically, EIS alludes to beneficial impacts from attached NSO restrictions to oil and gas leasing, but only gives random bits of information on which SRMA's would include such restrictions and to what degree. This lack of basic info makes it impossible for reader to know what special recreation resources will be protected and how. Page 4-143 says that each SRMA would have a management plan that would specify the limits of mineral resource development. We believe these are	A wide range of alternatives were analyzed to determine all impacts to resource values including recreation and oil and gas leasing. The Record Of Decision (ROD) will delineate SRMAs as well as stipulations for oil and gas leasing. Activity plans will be prepared to implement identified SRMAs after the Record Of Decision is signed.	

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			land use decisions, not implementation decisions (per BLM handbook), and should therefore be included in the draft.		
Ranges West	O-43	RE45 (ARE-3)	Why is recreation given special socioeconomic condition here and other cultural activity such as grazing and mineral or energy discussions on pages 3-35 thru 3-46 do not even recognize socioeconomic characteristics or importance. This discussion of recreation socioeconomics does not belong in chapter 3.10 but should be part of Chapter 3.12. Treat all resource uses similarly.	The PRMP/FEIS text has been amended to combine the socioeconomic considerations in Section 3.10.4 with the tourism and recreation socioeconomic description in Section 3.12.2.2.4.	X
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RE66 (NRE1)	Concerned that neither BLMs preferred alternative, nor the other management alternatives provide sufficient protection for the ecosystem from the impacts of intrusive activities, especially ORVs and oil and gas development.	The commenter does not provide additional information or explain what constitutes "sufficient protection." The PRMP/FEIS alternatives were developed and based on issues identified during the scoping process and on planning criteria for preparation of an EIS (40 CFR 1501.7) as described in Section 1.7.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RE68 (NRE3)	We believe that mechanical recreation (both motorized and mountain bike) be suitable for Compatible Use Areas on designated routes only.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RE69 (NRE4)	ORV use has substantial impacts on the ecosystem, affecting wildlife, wildlife habitat, and the entire landscape.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for	O-46	RE70 (NRE5)	Vehicular impacts on vegetation range from complete denudation of large staging areas to selective kill-off of the most sensitive plants. This does appear to have	Comment noted.	

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Native Ecosystems			been adequately considered in the EIS.		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RE71 (NRE6)	ORV use can lead to reduced density and diversity of small mammal populations (Bury 1977, BLM 1978, CEQ 1979, Liddle 1997). This needs to be considered in the EIS.	OHV use and its impacts are considered in Table 2.1.22 (Travel – Roads and Trails) of the PRMP/FEIS as well as Section 4.19.2.7 (Recreation and Travel Effects on Wildlife and Fisheries).	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RE72 (NRE7)	We appreciate BLM's acknowledgement of the damage that off-road vehicles (ORVs) can have to wildlife, habitat and wilderness characteristics and BLM's commitment to designating routes in this planning process. However, we remain concerned that neither the BLM's preferred alternative nor the other management alternatives provide sufficient protection for the ecosystem from the impacts of intrusive activities, especially ORVs and oil and gas development.	See comment response RE66. See Alternative E in the PRMP/FEIS. Alternative E provides the largest range of protection for lands with wilderness characteristics.	
Southern Utah Wilderness Alliance	O-47	RE23 (RE-C)	The draft plan is wrong in contemplating a corridor 600 feet wide along ORV routes in which ORVs would be free to roam off the existing roadbed.	See comment response RE1.	
Southern Utah Wilderness Alliance	O-47	RE38 (RE-R)	In order to ensure the continued viability of these recreational experiences, BLM must during the RMP process, consider a recreation spectrum, one that will provide high quality recreation opportunities for various user groups.	As stated in Table 2.1.13 (Recreation Resources) in the PRMP/FEIS Section 2.4.11 Recreation Goals and Objectives, one of the recreation resource goals of the RMP is to: "Assure that there is a spectrum of recreation opportunities and settings through comprehensive integrated activity level planning."	
Southern Utah Wilderness	O-47	RE39 (RE-S)	The new RMP including recreation and ORV must comply w/ fed regulations. Specifically, VFO must take into account not only the increase in ORV use, but also	See comment response RE20.	

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Alliance			the damages caused to natural resources by such use and the heightened conflict between user groups as heretofore non-motorized areas are being transformed into motorized areas. The DRMP fails to adequately address these and other resource damages and user conflicts.	The BLM would make future OHV route adjustments in areas designated as Open and/or Limited based on access needs, recreational opportunities, and natural resource constraints. These adjustments are beyond the scope of the PRMP/FEIS and would be analyzed at the activity planning level under other NEPA processes and documents.	
Southern Utah Wilderness Alliance	O-47	RE40 (RE-T)	Consider designating particular routes "administrative" routes, so that the permittee, lessee or BLM can access areas by motor vehicle if deemed necessary. The current trail system must also be segregated into motorized and non motorized portions.	The commenter does not provide additional information nor explain why or where trail segregation should be proposed.	

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State of Utah	G-1	RW18	The riparian strategies developed under alternative A are supported by UDWR (page 2-53). Healthy riparian systems are a limited habitat type in the VFO and support a great diversity of wildlife populations. These strategies will benefit sensitive species such as Colorado River cutthroat trout. The RMP should further define how often monitoring will occur. Monitoring is critical for these management strategies to be successful.	See comment response RW8.	
Duchesne County	G-9	RW25 (RW-G)	Introduction of moose populations into riparian areas would seem to have similar impacts as livestock grazing versus the long term, indirect beneficial impacts stated in this section.	Comment noted.	
Duchesne County	G-9	RW26 (RW-H)	If an exception were granted to allow development within 100 meters of a riparian area, based on exception criteria #1, there would impacts on listed species. However, if the exception were granted based on criteria #2, there may be short-term impacts but no long-term impacts. If the exception were granted based on criteria #3, there should not be any adverse impacts.	Comment noted.	
Duchesne County	G-9	RW3	It is the position of Duchesne County that the statutory requirement regarding the management of riparian areas is to provide "reasonable protection," not to prevent against any and all impacts. The intent is to "maintain function." Riparian area buffer zones of no surface disturbance should be determined in an adaptive and flexible manner and only when site-specific analysis shows it is necessary to reasonably protect the area. RMP and Forest Plans must require that waters and riparian areas be managed so as to not impair function and reduce grazing allotments based	This is beyond the scope of the PRMP/FEIS. BLM must adhere to Executive Order 11988 (1977) for Floodplains/Utah Riparian Management Policy which states that: "No new surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown that (1) there are no practical alternatives or (2) all long-term impacts can be fully mitigated or (3) the activity will benefit and enhance the riparian	

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			on AUM's (sic) or create expansion of NSO requirements on lands historically open to mineral development. In keeping with BLM IM 2003-233 and 2003-234, the riparian buffer distance should be set based on site specific analysis and should be no greater than the least amount necessary to accomplish the desired resource protection. Providing a blanket 100-meter buffer is not acceptable.	area.” The proposed plan includes the exceptions noted above in Appendix K.	
U.S. Fish and Wildlife Service	G-12	RW29 (JRW-2)	Riparian: Alternative C should be more protective of riparian habitat than Alternative A, not the same as Alternative A. Reassess stubble height and utilization levels accordingly. We recommend hat Alternative C be carried forward into the preferred alternative.	Comment noted.	
USFS—Ashley National Forest	G-19	RW14	Section 3.7.2 (page 3-36) confirms that 60 allotments need improved resource conditions and 53 are in custodial management with low productivity; these are areas of concern for riparian conditions. In addition, even allotments with good upland conditions can have degraded riparian conditions. Please provide for riparian health in riparian zones currently below good ecological condition.	As stated in Section 4.11, impact-causing activities within riparian areas are subject to restrictions under the Utah BLM Standards for Rangeland Health. “All of the RMP alternative must adhere to Standard 2 of the Rangeland Health: riparian and wetland areas must be in properly functioning condition (PFC).”	
USFS—Ashley National Forest	G-19	RW15	Some of the actions and direct/indirect effects associated with this RMP do not seem consistent with the goals for riparian areas. Please address that the stubble height standards may not accommodate needs of riparian areas which are below good ecological condition (about 42% of VMA riparian areas are below properly functioning condition). There may be conflicts between riparian goals and the degraded watershed conditions described from minerals management. The general concepts for quality riparian vegetation condition and stream/flooding function are good.	The commenter does not explain or describe how and why the stubble height standards may not accommodate riparian area needs. The commenter does not explain or illustrate what conflicts may arise or exist between riparian goals, degraded watershed conditions, and minerals management.	
USFS—	G-19	RW16	A stubble height of 4 inches applied appropriately to	See Section 4.13.2.7; Effects of Riparian	

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Ashley National Forest			hydrophilic vegetation would generally represent utilization greater than 30%; a height of 6 inches would generally represent utilization greater than 20%. The translation to percent utilization would be species-dependent. Clary and Webster (1989) affirm that these stubble heights are only suitable for maintenance of riparian systems in good to high ecological status and are not sufficient for “conditions to be improved” as asserted under Alternatives A and C. The effects to those riparian areas below Proper Functioning Condition – which would likely include degradation of some – is not addressed in the analysis. Please address these considerations.	Management Decisions on Water and Soils. See Section 4.13.2.7.1 Alternative A & C; less than 20% utilization if conditions are to be improved. See page 2-19, Section 2.4.7.4; Grazing and River Corridors, 4th paragraph; if grazing is causing resource degradation, and all other options have been exhausted, temporarily close those riparian areas that do not satisfactorily respond to changes in management.	
USFS— Ashley National Forest	G-19	RW17	In Alternative B, grazing of riparian herbaceous vegetation in fall (50% or 60%) is excessive relative to recommendations in Clary and Webster (1989) and others, since these utilization levels would promote utilization of streamside willow by domestic livestock.	See Section 4.13.2.7; Effects of Riparian Management Decisions on Water and Soils. See 4.13.2.7.2 Alternative B; second sentence; key riparian woody vegetation would not be used more than 50%.	
USFS— Ashley National Forest	G-19	RW31 (LRW-2)	Please address riparian management goals for uses other than livestock utilization.	Riparian management goals were proposed with the purpose of improving riparian habitat, with management actions based on measurable stubble height of riparian vegetation. While it is implied that livestock grazing has an impact on riparian resource, the proposed riparian management actions would also apply to other resource activities (e.g., recreation, wild horses, wildlife, wildlife, fire management).	
USFS— Ashley National Forest	G-19	RW32 (LRW-3)	Paragraph 1 change to read “would be a result of surface disturbing activities both within and outside of the riparian zones.”	Section 4.11 of the PRMP/FEIS has been revised to include surface disturbing activities within and outside of riparian zones.	X
USFS— Ashley National	G-19	RW33 (LRW-4)	Stubble height criteria would not be expected to protect all of the riparian areas that are below proper functioning condition, provide additional protection for	The commenter does not provide additional information on why stubble height criteria are inadequate nor what additional protection measures	

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Forest			these systems.	should be applied.	
USFS— Ashley National Forest	G-19	RW34 (LRW-5)	Indirect effects to riparian areas from watershed disturbance and sediment related to minerals/oil/gas development not addressed.	Soils and watershed management are described in Section 4.11 of the PRMP/FEIS.	
USFS— Ashley National Forest	G-19	RW35 (LRW-6)	Clarify how 'active floodplain' is defined and discuss the importance of intermittent or ephemeral drainages.	An active floodplain is the level area with alluvial soils adjacent to streams that is flooded by stream water on a periodic basis and is at the same elevation as areas showing evidence of flood channels free of terrestrial vegetation, recently rafted debris or fluvial sediments newly deposited on the surface of the forest floor or suspended on trees or vegetation, or recent scarring of trees by material moved by flood waters.	
USFS— Ashley National Forest	G-19	RW36 (LRW-7)	The potential loss of PFC in Alternatives A and B is in contradiction to goals stated earlier in the document, and there also may be effects to riparian –dependent species.	Riparian habitat has been identified and mapped by the VFO and is managed for Properly Functioning Conditions (Section 3.11.2; Riparian and Wetland Inventory) thru rangeland management and riparian monitoring. Section 4.13.1.3 (Impacts Common to All Livestock and Grazing, Forage, and Wild Horse Management Decisions) could incorporate language on riparian habitat management associated with grazing practices. Refer to Section 2.4.12; Riparian and Section 3.11.1; Regional Overview.	
USFS— Ashley National Forest	G-19	RW37 (LRW-8)	Address the effects of authorized and unauthorized OHV use and dispersed camping to riparian areas.	Section 4.11.2.7.1 in the PRMP/F has been revised to include an analysis of OHV use on riparian resources. Additional analysis of OHV use has also been included in Section 4.11.2.7.1.	X
USFS— Ashley National Forest	G-19	RW38 (LRW-9)	Impacts to riparian soils and biological soil crusts should be considered an 'irreversible loss of resources and should be mitigated accordingly.	As stated in Section 4.13.1.3 of the PRMP/FEIS: "Through monitoring and changes in range use, soils should not become degraded to the point where they lose productivity; therefore no long-term	

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				<p>impacts should occur.”</p> <p>Thus, monitoring and mitigation of livestock grazing, wild horse, and other potential soil-degrading activities should reduce the risk of irreversible riparian soil losses within the VPA.</p>	
UBAOG	G-22	RW10	<p>The DEIS needs to disclose the fact that it has no current assessment of the Book Cliffs riparian zones. Twenty-year-old data are not meaningful or reliable. Riparian areas will recover (and change) relatively quickly. There have been major changes in the area and the DEIS cannot assume that area remains in "poor ecological condition." In the Book Cliffs area, the Rocky Mountain Elk Foundation purchased ranches and grazing permits in the early 1990's and the area has only been lightly grazed by livestock on those permits. If the riparian zones have not improved, then BLM needs to disclose the fact that this has not occurred due to domestic livestock grazing.</p>	<p>As stated in Section 3.11.2, a preliminary wetland inventory has been conducted of riparian and wetland resources within the VPA (as of 2003). A comprehensive assessment of riparian conditions has yet to be conducted by a full interdisciplinary team. Once the inventory is completed, the condition of wetlands and riparian resources could change. Section 3.1.2 of the PRMP/FEIS has been revised to include a statement that states that:</p> <p>“...current riparian conditions within the Book Cliffs are being assessed, and that conditions could have changed since the 1984 riparian/wetland assessment.”</p>	X
UBAOG	G-22	RW11	<p>How can Alternative A have more indirect beneficial impacts to riparian resources than Alternative D when both are stated to preclude agricultural entry onto withdrawal lands?</p>	<p>Both alternatives preclude agricultural entry on land withdrawals. However Alternative A would preclude agricultural entry on 36,265 acres versus 35,900 acres under Alternative D.</p>	
UBAOG	G-22	RW12	<p>This paragraph implies that ecologically sound manners of timber harvesting would occur only under Alternatives A and C. However, Page 9 of Appendix K indicates that all surface disturbing activities across the planning area, even under Alternatives B and D, would be regulated with setbacks and other restrictions to protect riparian areas. Correct analysis.</p>	<p>The setbacks and restrictions described in Appendix K for do not apply to the Book Cliffs RMP area for Alternative D, thus making this Alternative less restrictive than the other alternatives. Consequently, Section 4.11.2.3.1 is still accurate in its analysis.</p>	
UBAOG	G-22	RW13	<p>Construction of new roads across riparian areas does not create an irreversible or irretrievable loss of habitat.</p>	<p>Section 4.11.6 in the PRMP/FEIS (Riparian and</p>	

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			If such roads are deemed to no longer serve a public purpose after the activity they serve is completed, such roads can be removed and the habitat restored. By proper designing of such road this could be beneficial in that such development could be used to control or retain water.	Wetland Resources) states that: "There would be no irreversible and irretrievable impacts to riparian habitat from RMP decisions."	
UBAOG	G-22	RW4	Given the number of factors that are included in Proper Functioning Condition (PFC), it is difficult to understand the basis for the statement that PFC might not meet the resource goals for fisheries, birds, etc. PFC is not a "minimum" standard. The RMP cannot impose additional standards.	Proper Functioning Condition is identified in Table 2.1.16 (Riparian Resources) as the minimum acceptable riparian goal, toward which management actions in the RMP are focused. The BLM has administrative leeway to impose management actions, stipulations, restrictions, prescriptions, etc., within the parameters of existing federal law and policy, to allow the agency to achieve its management goals.	
UBAOG	G-22	RW5	The prevention of surface disturbing activities within these areas prevents development such as roads, pipelines, power etc. and to avoid these areas with such development would create additional surface disturbances required to circumvent them. These disturbances have not been analyzed or disclosed in this draft. This is substantiated by the fact that there are no maps to delineate these areas. Such prohibitions add greatly to the cost of development, and in some areas, could prevent development of the joining lands. Such activities should be provided for when designed to prevent impacts to the proper functions of these systems. The proposal here lacks the required analysis with respect to analysis of need and a determination that the proposed restriction is the least restrictive necessary.	Table 2.1.16 (Riparian Resources) of the PRMP/FEIS under the subsection entitled Management Common to All Action Alternatives states that no surface disturbing activities would be allowed unless: "(a) there are no practical alternatives; (b) impacts would be fully mitigated." Nowhere does it state that management actions would prevent development. Disturbances and impacts to riparian and wetland resources from development actions have not been analyzed in this EIS because those actions are site-specific and would require site-specific analyses unique to a project. This PRMP/FEIS is a programmatic document, and site-specific analyses are beyond the scope of the document. Site-specific analyses	

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				of project-specific impacts would be analyzed under other NEPA processes and documents.	
UBAOG	G-22	RW6	Herding is very expensive and not a reasonable alternative. Except for sheep an essential component of riparian management is to provide alternative sources of water. This facilitates distribution of livestock and big game/wild horses. The prescription omits significant factors of big game and wild horses and unfairly targets the livestock industry. As this is written, there are few options other than to drive the livestock operator out of business. The BLM should not put itself in the position of telling a livestock operator which kind of livestock to raise. This is especially true when there are significant differences between the market for cattle and sheep and the permittee's capability to change.	The management actions listed to meet riparian objectives in Table 2.1.16 (Riparian Resources) of the PRMP/FEIS are a range that includes herding of livestock as a potential management action that could be applied where appropriate. Nowhere in this table is it implied or stated that the livestock grazing industry is specifically targeted for application of riparian and wetland resources management actions.	
UBAOG	G-22	RW7	Cottonwood and willow are heavy water users and could change the nature of the wetland or riparian area. Any such discussion must include control of tamarisk as it competes with cottonwoods and willows for water. Not all wetlands or riparian ecosystems include cottonwood or willow.	The management of native and naturalized plant species, and invasive plant species impacts and control are discussed under Table 2.1.23 (Vegetation Resources) under the subsection entitled Management Common to All Action Alternatives.	
UBAOG	G-22	RW8	Only broad goals such as assignments of resources should be considered in the RMP. BLM continues to use prescriptive management throughout this document. This section needs to be struck in favor of outcome based goals and adaptive management to achieve out comes.	FLPMA and NEPA require that the Vernal RMP consider and propose a range of alternatives and resource management actions for management of the VPA, and that management actions be chosen to achieve and maintain the approved resource objectives for the VPA. As stated in Section 1.5 of the PRMP/FEIS, monitoring and evaluation of the revised RMP management actions will be documented through supplements, addenda, and amendments to achieve the RMP's approved management actions for resources within the VPA.	
UBAOG	G-22	RW9	The RMP inaccurately assumes that livestock grazing	As stated in Section 4.16, forage use by livestock	

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			will continue to harm riparian resources. Livestock grazing has occurred in these riparian areas for more than 100 years. Before that other big game grazed there. In addition, these riparian areas receive heavy utilization by wild horses and big game. As written this is very biased and not entirely accurate.	could have adverse impacts on vegetation by altering plant productivity, changing plant communities, changing plant succession trajectories, increasing soil disturbance and sedimentation rates, compacting soil, and increasing the potential for introduction of exotic plant species.	
Ute Tribe of the Uintah and Ouray Reservation	G-29	RW74	No leasing/activity should occur within one-half mile of any spring or riparian area.	Appendix K outlines stipulations for surface disturbing activities near riparian areas. These stipulations apply to all alternatives and throughout the planning area and include no surface occupancy within active flood plains, public waters, or 100 meters of riparian areas.	
Nancy Bostick	I-162	RW19 (RW-A)	We urge the BLM in the final plan to include measures that will restore those substandard riparian areas: (a) close OHV routes in riparian areas (b) adjust livestock grazing to foster restoration of natural riparian habitat.	Comment noted.	
Laird Fetzer Hamblin	I-171	RW28 (JRW-1)	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.	See comment response RW1. As presented in Table 2.1.16 (Riparian Resources) of the PRMP/FEIS, the range of proposed management actions for riparian resources includes actions to improve and/or maintain riparian proper functioning condition.	
Newfield Exploration Co.	O-4	RW1	FEMA 100-year floodplain maps do not provide consistent coverage for the area of the VFO and should not be used to designate areas of no new surface disturbance. The gaps in the map coverage	As stated in Section 3.11.2, a preliminary inventory of riparian and wetland resources was conducted within the VPA. This inventory, when combined with FEMA floodplain coverages, provided sufficient	

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			require subjective interpretation. A minimum waterway dimension or flow rate should be specified instead.	information to determine the condition of wetland and riparian resources. As stated in section 3.11.2, the riparian and wetland condition inventory is preliminary and may change as the inventory is completed.	
Newfield Exploration Co.	O-4	RW2	Define what a "riparian area" is to avoid inconsistent application of the "no new surface disturbance" stipulation.	Riparian Area is defined in the glossary on page GL-14.	
Utah Farm Bureau Federation	O-9	RW11	How can Alternative A have more indirect beneficial impacts to riparian resources than Alternative D when both are stated to preclude agricultural entry onto withdrawal lands?	Both alternatives preclude agricultural entry on land withdrawals. However Alternative A would preclude agricultural entry on 36,265 acres versus 35,900 acres under Alternative D.	
Utah Farm Bureau Federation	O-9	RW12	This paragraph implies that ecologically sound manners of timber harvesting would occur only under Alternatives A and C. However, Page 9 of Appendix K indicates that all surface disturbing activities across the planning area, even under Alternatives B and D, would be regulated with setbacks and other restrictions to protect riparian areas. Correct analysis.	The setbacks and restrictions described in Appendix K for do not apply to the Book Cliffs RMP area for Alterative D, thus making this Alternative less restrictive than the other alternatives. Consequently, Section 4.11.2.3.1 is still accurate in its analysis.	
Duchesne County Water Conservancy District	O-10	RW23 (RW-E)	DCWCD feels that the correct management of riparian areas is to provide "reasonable protection" not prevent all impacts. DCWCD feels that riparian area buffer zones should be determined in a flexible manner and only when studies show it is necessary to reasonably protect a particular area. RMP and forest plans must require that waters and riparian areas be managed so as to not impair function or reduce domestic grazing allotments.	Comment noted.	
Newfield Exploration Co.	O-13	RW22 (RW-D)	Our experience has been that the FEMA 100 yr floodplain maps do not provide consistent coverage in the area you are trying to regulate. Thus allowing no new surface disturbance within active floodplains requires subjective interpretation and is enforced inconsistently. A minimum waterway dimension or flow	See comment response RW1.	

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			rate should be defined. Specify what size floodplain you wish to protect to avoid over-regulating tiny intermittent or ephemeral washes. Likewise, you should define what a "riparian area" is to avoid inconsistent application of this stipulation.		
IPAMS	O-14	RW30 (LRW-1)	The conditions for granting a waiver in Chapter 4 are inconsistent with the stipulations for riparian floodplains in Appendix K.	<p>See comment response RW3.</p> <p>Executive Order 11988 (1977) for Floodplains/Utah Riparian Management Policy which states that "No new surface disturbing activities will be allowed within 100 meters of riparian areas unless it can be shown that :</p> <p>(1) there are no practical alternatives or</p> <p>(2) all long-term impacts can be fully mitigated or</p> <p>(3) the activity will benefit and enhance the riparian area.</p>	
Howard County Bird Club	O-18	RW19 (RW-A)	We urge the BLM in the final plan to include measures that will restore those substandard riparian areas: (a) close OHV routes in riparian areas (b) adjust livestock grazing to foster restoration of natural riparian habitat.	Comment noted.	
American Rivers	O-22	RW20 (RW-B)	The BLM can not ensure riparian and wetland functioning, as directed by Standard 2 of the Utah BLM Standards and permit extensive mineral oil and gas exploration at the same time. The DEIS states "The Utah BLM Standards for Rangeland Health apply to riparian resources in the VPA. All alternatives must adhere to Standard 2 of these standards, "Riparian and wetlands [must be] in properly functioning condition. Stream channel morphology and functions appropriate to soil type, climate and function (BLM 1997)." (page 4-161)	The commenter does not explain why the BLM cannot ensure riparian and wetland functioning, as directed by Standard 2 of the Rangeland Health Standards.	

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American Rivers	O-22	RW21 (RW-C)	Coalbed methane extraction in particular is completely incompatible since it results in severe lowering of the water table and scouring of streambeds and banks. The DEIS p 4 clearly states "draw down of groundwater due to techniques used to extract oil, gas and coal bed methane could lead to dewatering of riparian areas, increasing the risks of invasive species introduction and reducing water available for riparian ecosystems." (p 4-162). "If authorized activities would require reclamation and rehabilitation actions to ensure sustainability and productivity of the site." Yet none of the reclamation and rehab activities are studied or examined thoroughly in the DEIS and RMP, a significant oversight that will lead to substantial degradation of the watershed and riparian areas.	Site-specific techniques for reclamation and rehabilitation of sites impacted by coal bed methane projects is beyond the scope of the RMP EIS. Project-specific impacts would be analyzed and mitigations proposed through site-specific NEPA processes and documents.	
Cripple Cowboy Cow Outfit	O-30	RW24 (RW-F)	For the best benefits to riparian areas you should use Alt B all the way from maximum fire to maximum AUMs with the addition of 80% utilization.	Comment noted.	
Vermillion Ranch Limited Partnership	O-33	RW52 (R-RW1)	<p>Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Management actions to meet riparian objectives would include alternative sources of water, fencing, herding, change of livestock class, temporary closures, and/or changes of season. Additional management actions would include reductions in big game and/or wild horse numbers."</p> <p>Herding is very expensive and not reasonable alternative without proper infrastructure (fencing and water). Herding is not a substitute for structural range improvements. An essential component of riparian management is to provide alternative sources of water</p>	<p>The management actions listed in Table 2.1.16 (Riparian Resources) of the PRMP/FIES to meet riparian objectives are a range that includes herding of livestock as a management action that would be applied where appropriate. Nowhere in this section is it implied or stated that the livestock grazing industry is specifically targeted for application of riparian and wetland resources management actions. The commenter does not provide additional information on what "significant factors" have been omitted from livestock grazing prescriptions.</p> <p>Table 2.1.16 under the subsection entitled Management Common to All Action Alternatives has been revised to read as follows:</p>	X

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			to facilitate distribution of livestock and big game / wild horses. The prescription omits significant factors of big game and wild horses and unfairly targets the livestock industry. It also implies that BLM will not support nor fund the range improvements necessary to properly manage the rangeland resources.	"Appropriate management actions to meet riparian objectives could include fencing, herding, change of livestock class, temporary closures, and/or change of season."	
Vermillion Ranch Limited Partnership	O-33	RW53 (R-RW2)	<p>RE: Alternative A (Pages 2-53 and 2-54)— Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Key streamside herbaceous riparian vegetation, where stream bank stability is dependant dependent upon it, would have a minimum stubble height at the end of the growing season capable of trapping and assuring retention of sediment during high flows. Management actions could be based on residual stubble height of key herbaceous species measured from the green line or utilization of current year's growth at the end of the growing season. An initial management action would be to set a stubble height of 4 inches or 30% utilization on key herbaceous species measured from the green line if riparian conditions in that reach are to be maintained and 6 inches stubble height on key herbaceous species measured from the green line or <20% utilization if riparian conditions need to be improved. This initial stubble height or utilization level would need to be jointly monitored by the permittee and BLM to verify if it provides for maintenance or improvement objectives, with adjustments in allowable utilization or stubble height being made as needed."</p> <p>Make the same changes for Alternative A, same pages.</p>	<p>Table 2.1.6 (Riparian Resources) of the PRMP/FEIS has been revised to correct the spelling error in Table 2.3 (Riparian Alternative A).</p> <p>The BLM declines to make the other 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.</p>	X

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			<p>Make the same changes on Page 2-86 under Alternative A.</p> <p>Make the following changes on Page 2-86 for Alternative D:</p> <p>"Upland utilization and riparian vegetation utilization measurements are specified in allotment management and grazing plans, rather than in the RMP unspecified, and proper use would potentially be maintained."</p> <p>The alternatives incorrectly use the stubble height and utilization standards interchangeably. They are not interchangeable and as written, they are not defined properly. The RMP should adopt the stubble height standard as revised. This comment applies throughout the document, which refers to riparian grazing use standards in terms of (4" stubble on key herbaceous species or 6" stubble height or 30% to 20% utilization presumably on woody species. See e.g. 2-53, page 2-86 and 2-93. The riparian standards stated on page 4-238, 4.15.2.2.1 Alternative A (also see line 2 page 4-239) are equally problematic. The differences in wording regarding key species vs. woody species are significant and could lead to very troublesome interpretations by staff. Monitoring needs to be jointly done by BLM and the permittee. The RMP discussion is inaccurate.</p>		
Vermillion Ranch Limited	O-33	RW54 (R-RW11)	Modify the following statement as indicated by bolded additions and strikethrough deletions:	The BLM declines to make the suggested wording changes for a variety of reasons including but not limited to, the following:	

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Partnership			<p>Effects of Minerals decisions may have adverse direct and indirect effects on riparian resources would be adverse, long-term, and direct, resulting from in upland erosion and subsequent stream sedimentation through surface disturbing activities. These potential impacts are mitigated by best management practices for nonpoint source pollution and BLM fluid minerals BMPs. The impacts analysis represents relative risks of adverse impacts to riparian resources by alternative, due to the incomplete riparian inventory data. Site-specific analyses would need to be undertaken on a case-by-case basis to establish quantitative impacts. Reclamation and restoration of oil and gas, locatable minerals, surface minerals, and alternative energy sites would be required upon abandonment of the site, resulting in less stream sedimentation. The risks of accidental release of hazardous materials and petroleum products from oil, gas, and coal bed methane (CBM) leasing sites would also have an indirect, long-term, adverse impact on riparian resources. Drawdown of groundwater due to techniques used to extract oil, gas, and coal bed methane could lead to dewatering of riparian areas, increasing the risks of invasive species introduction and reducing water available for riparian ecosystems.”</p> <p>Mineral development decisions would have temporary and largely mitigated impacts on riparian resources. There is little, if any basis, for the statement that oil and gas or CBM development will dewater a riparian area. Similar discussions with BLM planning specialists agree that a riparian area would be “dewatered” only if a reservoir were built and the stream diverted into the reservoir.</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>	

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			<p>CBM produces water from the coal, not underground aquifers. Thus this statement in the RMP shows a shocking lack of understanding regarding CBM. Oil and gas development produces water only when the well fails to strike oil or gas and this is temporary since such strikes are quickly plugged. Wells are cased as they are drilled so going through an aquifer does not pump water from the aquifer. Technology allows drilling with little adverse effects, including within the flood plain of the Green River.</p>		
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>RW55 (R-RW4)</p>	<p>RE: Alternative D— The RMP does not justify the proposed change from Alternative D and no change should be made.</p>	<p>BLM must provide a reasonable range of alternatives for consideration and analysis.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>RW56 (R-RW5)</p>	<p>RE: Alternative A—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"245,649 AUMs allotted with 4" to 6" stubble height of key herbaceous species measured on the green line 30% riparian utilization and grazing by big game and wild horses may would cause more short-term adverse impacts to riparian resources than Alternative C."</p> <p>The RMP inaccurately assumes that livestock grazing will harm riparian resources. First, livestock grazing has occurred in these riparian areas for more than 100 years. These riparian areas receive heavy utilization by wild horses and big game. As written this is a very biased and not accurate. Second, other uses contribute to effects on riparian resources. Third, livestock grazing has declined while big game (and wild horse) numbers have increased. The RMP needs to</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>	

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			reconsider the assumption that livestock grazing is the sole or even major factor in adverse impacts to riparian resources.		
Vermillion Ranch Limited Partnership	O-33	RW57 (R-RW6)	<p>RE: Alternative D—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"246,128 AUMs allotted with unspecified use of riparian areas in the current RMPs but riparian use is specified in grazing plans and allotment management plans. would have the greatest adverse impacts to riparian resources."</p> <p>This statement in the RMP with respect to Alternative D is flatly incorrect. Riparian use is specified in the individual allotment management and grazing 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> <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	RW58 (R-RW7)	<p>RE: Alternative A—Modify the following statement as indicated by bolded additions and strikethrough deletions:</p> <p>"Rangeland improvements would treat 34,640 acres, and this reduction in acres treated will result in less benefit with the least beneficial impacts to riparian resources from which would occur with more acres treated. Vegetation treatments seek to improve improving filtration (reducing sedimentation) and range improvement structures elsewhere reduce reducing livestock, wildlife, and wild horse watering within riparian areas."</p> <p>The RMP never explains why Alternative A has the</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>	

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			<p>least benefits from range projects nor does it explain the reason for fewer acres. As written this makes little sense and assumes that only livestock grazing adversely affects riparian areas. Range projects have equal benefits to riparian areas through better distribution and use of water elsewhere on the public lands by wildlife and wild horses.</p>	<p>Table 2.2.12 (Range Improvements) of the PRMP/FEIS states that Alternative A is the most beneficial of all the alternatives because it would treat the greatest number of acres.</p>	
<p>Vermillion Ranch Limited Partnership</p>	<p>O-33</p>	<p>RW59 (R-RW8)</p>	<p>Modify the following statement as indicated by bolded:</p> <p>"Approximately 16,000 acres of riparian zones are found along the Green and White Rivers and Bitter, Evacuation, Sweetwater, and Willow Creeks in the Book Cliffs portion of the VPA. As of 1982, 470 acres of riparian zones in the Book Cliffs portion of the VPA were identified as being in poor ecological condition (BLM 1984). These data are not current and are probably not an accurate indicator of current conditions. BLM will continue to complete the range health assessments for each allotment. The Diamond Mountain portion of the VPA contains 60,300 acres of riparian lands (2 percent of the inventoried lands), with 15,650 acres of the 60,300 acres in public lands. There are 540 miles of perennial and intermittent streams in the VPA (BLM 1993b). The BLM manages its riparian zones for multiple uses, including recreation, grazing, wildlife habitat, and other uses."</p> <p>The DEIS needs to disclose the fact that it has no current assessment of the Book Cliffs riparian zones. Twenty-three year old data are not meaningful nor reliable. Riparian areas will recover (and change) relatively quickly. The DEIS cannot assume that area remains in "poor ecological condition." Nor is it accurate for the RMP to imply that the poor ecological</p>	<p>Section 3.11.1 of the PRMP/FEIS has been revised to include clarification of out-dated riparian data for the Book Cliffs and an acknowledgment that preliminary inventories have been conducted, to be followed by comprehensive VPA wetland and riparian inventories (Section 3.11.2). The reads as follows:</p> <p>"Approximately 16,000 acres of riparian zones are found along the Green and White Rivers and Bitter, Evacuation, Sweetwater, and Willow Creeks in the Book Cliffs portion of the VPA. As of 1982, 470 acres of riparian zones in the Book Cliffs portion of the VPA were identified as being in poor ecological condition (BLM 1984). However, current riparian conditions within the Book Cliffs are being assessed, and riparian conditions could have changed since the 1984 riparian/wetland assessment (see 3.11.2 below). The Diamond Mountain portion of the VPA contains 60,300 acres of riparian lands (2 percent of the inventoried lands), with 15,650 acres of the 60,300 acres in public lands. There are 540 miles of perennial and intermittent streams in the VPA (BLM 1993b). The BLM manages its riparian zones for multiple uses, including recreation, grazing, wildlife habitat, and other uses."</p>	<p>X</p>

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			<p>conditions are due to domestic livestock grazing or that they still exist. For instance, in the Book Cliffs area, the Rocky Mountain Elk Foundation purchased ranches and grazing permits in the early 1990's and the area has not been grazed by livestock since that purchase. If the riparian zones have not improved, then BLM needs to disclose the fact that these resource conditions are not due to continued domestic livestock grazing and BLM must pursue wildlife (elk) reductions and vegetation projects. BLM and permittees have been actively monitoring rangeland health conditions over the last several years. A significant percent are in functioning condition. In the areas that are at risk or not functioning, we find that there is major wildlife use, especially on willows. In other cases, road crossings may funnel runoff to create an arroyo effect that prevents the establishment of vegetation.</p>		
Vermillion Ranch Limited Partnership	O-33	RW60 (R-RW9)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Impacts to riparian areas in the VPA would be a result of surface disturbing activities and forage use within the riparian zones..." and "...These are preliminary numbers and will change as the inventory is completed. Monitoring Joint monitoring by the permittee and the BLM would be used to determine the trend and condition of riparian areas..."</p> <p>The RMP fails to manage big game or wild horses in riparian areas, thus forcing the livestock industry to bear the full brunt of riparian management. This is only exacerbated by the lack of assurances that BLM will fund and approve range projects necessary.</p>	<p>The BLM does manage big game or wild horse in their association with riparian habitat. During inventories to comply with rangeland health standards the BLM monitors riparian habitat. If these inventories prove less than PFC for the habitat, cause of the impacts are determined and solutions are evaluated and implemented. Section 4.11 in the PRMP/FEIS now read as follows:</p> <p>"Impacts to riparian areas in the VPA would be a result of surface disturbing activities and forage use both within and outside of the riparian zones and are subject to restrictions to insure conditions are improved or at least not degraded. The Utah BLM Standards for Rangeland Health apply to riparian resources in the VPA. All alternatives must adhere to Standard 2 of these standards, "Riparian and</p>	

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			<p>Even if the range improvement projects are implemented, unless the big game and wild horses numbers are managed, riparian areas will still not maintain, meet, or make progress towards meeting rangeland health standards. The riparian area discussion is not based on sound data. Much of the data was collected more than 20 years ago. DEIS 3-55. Thus, proposed management changes are premature and should be preceded by joint permittee and BLM monitoring.</p> <p>The estimates regarding functioning condition suggest that the inventory is not done and it is inaccurate. Elsewhere the DEIS refers to 1982 data. If the RMP is mixing data, it needs to justify doing so. The inventory fails to attribute the causal factors in nonfunctioning condition. These are material omissions that would dramatically change the recommendations regarding management. The last sentence is also the reason that other aspects of the RMP, such as seasons of use and phenology, need to be deleted from the RMP and deferred to the specific allotments.</p>	<p>wetland areas [must be] in properly functioning condition (PFC). Stream channel morphology and functions are appropriate to soil type, climate, and function" (BLM 1997)."</p>	
Vermillion Ranch Limited Partnership	O-33	RW61 (R-RW10)	<p>Not all upland surface disturbance will accelerate erosion. Utah non-point source best management practices and BLM BMPs also limit surface erosion. Any sedimentation will depend on the site, soils, slope and proximity to a water body. The general statement as written is inaccurate.</p>	<p>Section 4.11 of the PRMP/FEIS has been revised for clarification to state that "Upland surface disturbance could cause a loss of vegetation that could accelerate soil erosion..."</p>	X
Vermillion Ranch Limited Partnership	O-33	RW62 (R-RW11)	<p>Strike this entire statement in the document:</p> <p>"Drawdown of groundwater levels from oil, gas, and coal bed methane leasing could lead to dewatering of riparian areas."</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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			<p>This statement is untrue. Aquifers are not drilled for oil and gas. Water is produced from coalbed gas due to the release of gas and water is not intentionally pumped from existing aquifers. The pumping is unintentional and of short duration it is unlikely to dewater an aquifer.</p> <p>Oil and gas development does not drill into an aquifer to release water. Wells are cased so water is not released. Similarly the 100-year flood plain bears little relation to vegetation or soil resources and is not a valid basis to limit or prohibit drilling. Operators have been drilling in these areas for several years now without adverse effect.</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>See comment response RW54.</p>	
Vermillion Ranch Limited Partnership	O-33	RW63 (R-RW12)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Effects to riparian resources specified under forage and wild horse management decisions would be short-term, direct, and indirect potentially beneficial, depending on season of use and duration and wildlife and wild horse numbers. Some . These decisions would also have longterm direct beneficial impacts to riparian resources by improving riparian conditions, while other decisions will have neutral or adverse effects. AUMs would be adjusted for livestock, wild horses, and/or wildlife when joint monitoring by the permittee and BLM shows that riparian condition is not at PFC. Any benefits assume that wild horse numbers are reduced or maintain the AMLs in the HMAs and remove wild horses located outside of the HMAs."</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>	

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			<p>Forage decisions and wild horse management decisions will not benefit riparian resources in most if not all cases. The RMP adopts significant increases in elk and deer numbers which adversely affect riparian resources. Documented research consistently shows that well-timed grazing will benefit riparian areas. Similarly, the RMP fails to deal adequately with wild horse management, which to date has caused significant damage to riparian resources. While it may be true that the RMP changes will in some cases benefit riparian resources, the forage decisions cannot be said to do so, because they do not address grazing by wildlife and wild horses.</p>		
Vermillion Ranch Limited Partnership	O-33	RW64 (R-RW13)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>“The effects of livestock and grazing decisions on riparian areas would generally be adverse, long-term, and direct. Long-duration grazing would impact riparian areas through loss of vegetative cover and trampling of soils, potentially leading to riparian area degradation. Limited Well-timed livestock grazing , when properly managed, would benefit riparian areas by stimulating new growth in riparian vegetation. Effects on riparian vegetation vary between seasons of use. For example, grazing riparian areas in late spring allows vegetation to grow through summer and into the fall, where it can protect banks during critical spring runoff and late summer thunderstorms. Any changes to seasons of use or AUMs would need to be in compliance with Standard 2 (and all other standards) of the Utah BLM Standards for Rangeland Health and grazing rules after consultation, coordination, and cooperation with the permittee.”</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>	

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			<p>This statement epitomizes the bias found throughout the DEIS. It is simply untrue. Also note that big game and wild horse grazing is omitted suggesting that only domestic livestock harm riparian resources. Several decades of sound research consistently show that well-managed grazing will benefit riparian areas. Limiting grazing is not the solution. Better timing and better management of other grazing animals is.</p>		
Vermillion Ranch Limited Partnership	O-33	RW65 (R-RW14)	<p>There is no scientific basis to prohibit drilling 100 meters from riparian zones or within the 100-year flood plain. A riparian zone, in many cases, refers to vegetation changes when water might be briefly found or as a transition zone near a source of water.</p>	<p>See comment response RW3 above. BLM Executive Order 11988 (1977) for floodplain management establishes the riparian buffer zone of 100m to protect riparian and floodplain resources.</p>	
Vermillion Ranch Limited Partnership	O-33	RW66 (R-RW15)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"The effects of rangeland improvements on riparian areas would be beneficial, long-term, indirect, and direct.</p> <p>Vegetation treatments would ultimately reduce stream sedimentation and improve riparian vegetative cover. Fencing of riparian areas, development of water, and establishment of grazing systems, with related range improvements, would reduce impacts from grazing in these areas and development of other water sources away from riparian areas would limit grazing use of river corridors. Development of reservoirs would have long-term adverse impacts to riparian resources by inundation of riparian habitat and dewatering of downstream areas."</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> <p>Recommend reference to Sections 2.4.12, 3.11 and 4.13.1.3 of the RMP.</p>	

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Commenter	Record ID & Comment Number	Resource Category	Comment Text	Response to Comment	Doc Mod
			<p>Fencing will not prevent big game from grazing and elk use has a measurable and adverse impacts on VPA riparian areas.</p> <p>Reservoirs and stock water ponds store water and do not “dewater” downstream areas. Reservoir creates new type of water edge or riparian habitat.</p>		
Vermillion Ranch Limited Partnership	O-33	RW67 (R-RW16)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Visual resource management (VRM) decisions would impose visual restrictions on those riparian areas near be beneficial, long-term, and would directly affect riparian resources by precluding some areas from surface disturbance due to their proximity to highways, scenic areas, and special designations. Such restrictions would preclude other management actions, such as However, adverse, short-term, indirect impacts would occur if vegetation treatments could not be implemented in VRM sensitive areas and this would ultimately have adverse effects on riparian resources. VRM classes range from I to IV – Class I lands are not open to surface disturbance (full retention), and Class IV lands are available for full development."</p> <p>The RMP does not put all riparian areas into VRM Class II, so this statement is not accurate unless qualified. Second, BLM cannot classify riparian areas as per se Class II and meet the handbook criteria. Excluding or limiting vegetation treatment in VRM Class II in riparian areas will limit management tools and result in indirect adverse impacts on resources.</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> <p>The commenter is incorrect. Section 4.11.1 accurately states that some riparian areas would be protected under VRM Class I and Class II resource objectives by precluding surface disturbances in some riparian areas (due to their proximity to highways, scenic areas, and special designation areas). However, the impacts of vegetation control in VRM-sensitive areas would be site-specific and not limited or restricted based strictly on the VRM Class, but on the potential for</p>	

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				visual or scenic quality degradation. This level of analysis is beyond the scope of the EIS and would be determined for site-specific vegetation treatment projects through other NEPA processes and documents.	
Vermillion Ranch Limited Partnership	O-33	RW68 (R-RW17)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Wildlife and fisheries management would have limited direct and significant beneficial and adverse effects on riparian resources. Introduction of moose populations would have long-term, indirect beneficial and adverse impacts on riparian resources by increasing biodiversity in these areas while increasing forage competition. The BLM would provide habitat for a diversity of wildlife and fish species by limiting fragmentation, resulting in less surface disturbance which in turn may decrease and stream sedimentation. The effects of wildlife management decisions on riparian resources would be beneficial and adverse long-term, and indirect, by limiting surface development within specified wildlife buffer zones. Most of the wildlife and fisheries management decisions involve seasonal constraints and would not necessarily preclude surface-disturbing activities, although the cumulative effect will permit development on specific sites for less than three months of the year. This may result in increased impacts due to the concentration of development in a relatively short period of time. The only measurable component of wildlife and fisheries management decisions on riparian resources would be the preservation of crucial deer winter range and the enhancement of winter range to mitigate surface disturbance. The alternatives are similar with respect</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> <p>See comment response RW67.</p>	

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			<p>to their effects on riparian resources."</p> <p>This discussion is both biased and inaccurate. Wildlife can have very significant and adverse impacts on riparian resources.</p> <p>Sedimentation into riparian areas from surface development will depend entirely on the location and the extent of the development. The assumption that every possible surface disturbance will increase stream sedimentation is inaccurate. This is another example of how the DEIS cumulative effects discussion is inadequate. In an effort to only find benefits from wildlife management, the DEIS omits the cumulative effect of wildlife restrictions and the effects of concentrating activities in only a short period of time. The last sentence documents a major concern of the RMP, which is the lack of a genuine range of alternatives. The RMP adopts so many restrictions said to be "common to all alternatives" that in fact the so-called resource development alternative is more restrictive than the current RMP. This illustrates the extreme nature of the "common to all alternatives" restrictions and standards. It also violates NEPA, as explained in the cover letter to these comments.</p>		
Vermillion Ranch Limited Partnership	O-33	RW69 (R-RW18)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Vegetation treatments for rangeland improvement would total 34,640 acres, 50,900 acres, 45,860 acres, and 40,390 acres for Alternatives A, B, C, and D – No Action, respectively. Therefore, Alternative B would be the most beneficial to riparian resources, 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</p>	

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			<p>Alternative A would be the least beneficial, as compared to Alternative D – No Action. Fencing and development of water projects would facilitate provide for timed livestock grazing and would have an indirect beneficial effect on riparian areas. There may be some , except for trampling effects along the fence line. Water developments would provide water to upland range sites, keeping livestock and other ungulates out of sensitive riparian areas. Guzzlers, reservoirs, wells, and springs would attract livestock away from riparian areas and would decrease soil disturbance and sedimentation around riparian areas."</p> <p>Vegetation treatments are not only in riparian areas and the correlation to riparian resources is both indirect and site specific. The acreage figures do not make sense and should be described as an approximation not a ceiling. The discussion omits importance of water development, since fencing livestock away from the only source of water rarely works. The DEIS also exaggerates trampling along fences. Riparian areas are resilient not sensitive.</p>	<p>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>The commenter does not provide any additional substantiating information and/or explain how and why the acreage figures do not "make sense", why the acreage should be an approximation, why fencing "rarely works", why trampling along fences is exaggerated, and the resiliency of riparian areas.</p>	
Vermillion Ranch Limited Partnership	O-33	RW70 (R-RW19)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Alternative C would classify the most acres in ACECs, which would restrict or preclude development in the riparian areas affected. offer the greatest protection to riparian resources through ACEC designations, protecting This affects approximately 515,186 acres more than Alternative D. Alternative A classifies the second most acres as ACECs, involving offers the next best level of protection to riparian resources with approximately 182,072 more acres than Alternative D.</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</p>	

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			<p>Alternative C has the most miles of riparian corridor recommended for designation as either wild or scenic. Alternatives A, B, and D – No Action would recommend for designation less miles of wild and scenic rivers than Alternative C. These designations would restrict or preclude all development, even management designed to enhance riparian area resources."</p> <p>The SMAs do not directly correlate to benefiting riparian resources except by prohibiting or restricting surface disturbance. The surface management prohibitions or restrictions prohibit beneficial activities as well. Thus the assumption of "better protection" in Alternative C is not accurate.</p>	<p>or preferences.</p> <p>The suggested change had little relevance to the adequacy or accuracy of the RMP/FEIS.</p> <p>The commenter does not explain how and why, or provide additional information on what activities that would be beneficial to riparian resources within special management areas would also be restricted and prohibited because of surface management prohibitions.</p>	
Vermillion Ranch Limited Partnership	O-33	RW71 (R-RW20)	<p>Delete the following statement:</p> <p>"Alternative A would designate 67,357 and 446,287 acres as VRM Classes I and II respectively, which is 11,230 and 215,613 more acres with limits on surface disturbance than Alternative D – No Action. This alternative would provide more long-term indirect beneficial impacts, when compared to Alternative D – No Action, due lower levels of sedimentation and fragmentation of riparian areas."</p> <p>VRM classes and riparian areas have no correlation. This discussion should be deleted.</p>	<p>As stated in Section 4.11.2.14.1, VRM class objectives allow very little or limited visual impacts to areas designated as Class I and Class II. The indirect effects of reducing surface disturbances within riparian areas with these classifications would include the reduced likelihood of surface-disturbance-caused soil erosion, sedimentation, and habitat fragmentation.</p>	
Vermillion Ranch Limited Partnership	O-33	RW72 (R-RW21)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Proper functioning condition (PFC) is the minimum acceptable goal for riparian areas. Riparian-wetland</p>	<p>Section 4.13.1.7 of the PRMP/FEIS has been revised to read as follows:</p> <p>"Proper functioning condition (PFC) is the minimum acceptable goal for riparian areas. Riparian-wetland</p>	X

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			<p>areas would be maintained, restored, and managed protected, and/or expanded to achieve PFC with respect to soils, vegetation, and hydrology/water quality. Thus, riparian management would have short- and long-term, direct, beneficial impacts to soils and water through proper and well-timed grazing. where use of streamside vegetation is reduced."</p> <p>The RMP should focus on well-timed grazing rather than reducing livestock grazing.</p>	<p>areas would be maintained, restored, and managed to achieve PFC with respect to soils, vegetation, and hydrology/water quality. Thus, riparian management would have short- and long-term, direct, beneficial impacts to soils and water where use of streamside vegetation is reduced."</p>	
Vermillion Ranch Limited Partnership	O-33	RW73 (R-RW22)	<p>Modify the following statements as indicated by bolded additions and strikethrough deletions:</p> <p>"Under Alternatives A, B, and C, key streamside herbaceous riparian vegetation measured from the green line for a stubble height of 4 to 6", where stream bank stability is dependent upon it, would have a minimum stubble height capable of trapping and assuring retention of sediment during high flows at the end of the growing season. Management actions would be based on residual stubble height of key herbaceous species measured from the green line or utilization of current year's growth at the end of the growing season. To maintain riparian conditions, stubble height on key herbaceous riparian plant species would be set at four inches with 30% utilization. If riparian conditions need improvement, stubble height on key riparian plant species would be set at six inches with less than 20% utilization. Key riparian woody vegetation would not be browsed at a level that precludes adequate recruitment to maintain or recover the woody component. Woody vegetation would be managed for the sprouting and young categories rather than in the mature and dead</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>	

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			<p>categories. Woody vegetation utilization would be set at 30%.”</p> <p>The RMP needs to recognize that to maintain riparian conditions, stubble height for key herbaceous species should be measured on the green line to 4" and if conditions change, then to 6". The RMP's use of utilization in the context of the riparian areas should only apply to woody species, which is measuring different species from different points in the riparian area. Any change should be based on joint monitoring by the permittee and BLM.</p> <p>As noted earlier, measurement of key herbaceous species is quite different from and not interchangeable with utilization.</p>		
Ranges West	O-43	RW27 (ARW-1)	Pg 4-184, 4.13.1.5 Impact Common to range improvements: Last sentence at bottom of page: Biased and emotive use of words. Riparian areas are the least sensitive or most durable and recuperative part of a landscape. They may sometimes be heavily impacted by concentrated use and watershed energy but sensitive they are not.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW39 (NRW1)	BLM must provide better protection for riparian areas as these zones have great ecological importance and are biologically unique.	See comment response RW38.	
Wilderness Society, Wild Utah Project, Center for Native	O-46	RW40 (NRW2)	When assessing the biological role of the very limited number of riparian corridors in the Vernal Resource Area, it is important to consider the watershed that is associated with the main stream corridor.	As stated in Section 3.11.1, the PRMP/FEIS considers watershed features (ponds, designated wetlands, springs, riparian zones, etc) as well as main stem riparian corridors in its analysis of impacts.	

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Ecosystems					
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW41 (NRW3)	It is crucial that small, isolated wetlands interspersed within the landscape, such as springs and small ponds, are also carefully protected because they may partially aid in limited recolonization and dispersal between disjunct riparian zones in desert lands.	See comment response RW40.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW42 (NRW4)	Riparian zones will be substantially impacted by the management decisions made in the RMP.	The commenter does not provide additional information nor explain how, why, and to what degree riparian zones would be impacted by the RMP management decisions. Also, please refer to Section 3.11 of the PRMP/FEIS.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW43 (NRW5)	Heart of the West provides environmentally protective alternative management that should be fully evaluated and incorporated into the Vernal RMP for protection of riparian areas.	A range of protective measures are discussed and evaluated in Sections 3.11 and 4.11 of the PRMP/FEIS.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW44 (NRW6)	BLM must also discuss how it intends to bring riparian zones that are not functioning or functioning at risk back of a Properly Functioning Condition (PFC). Achieving this may well require cessation of ORV use and livestock grazing in all riparian areas in the Vernal Resource Area.	In Table 2.1.16 (Riparian Resources) of the PRMP/FEIS under the subsection entitled Goals and Objectives, management actions are discussed that could be used to meet riparian goals of bringing riparian areas into proper function condition. Site-specific actions to achieve riparian goals are beyond the scope of the RMP EIS. Site-specific actions or project-related actions to achieve riparian goals would be analyzed and discussed under site-specific NEPA processes and documents. Also, please refer to Section 3.11 of the PRMP/FEIS.	
Wilderness Society, Wild Utah Project, Center for	O-46	RW45 (NRW7)	Coalbed methane production is associated with lowering of water tables, wells and springs drying up, and increases in methane gas seeps, which kills vegetation and is a hazard to humans and wildlife	Comment noted.	

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Native Ecosystems			(BLM, n.d.).		
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW46 (NRW8)	We recommend that rangelands be managed to prevent the impairment of productivity and values (incorporate above text straight from FLPMA Section 103 (c)), and rangelands be managed to ensure wildlife habitat functions at a level that will ensure viable populations of native species in each habitat community.	Comment noted.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW47 (NRW9)	This section describes riparian habitat goals. The DEIS suggests that the Proper Functioning Condition (PFC) assessment method now used by many agencies be a minimum standard. We argue that the current PFC assessment fails to assess key biotic indicators required in the rangeland health standard. We request that you consider for implementation an alternative riparian assessment method developed by a group of scientists with the Wild Utah Project and Trout Unlimited, which was submitted with WUP's scoping comments.	In addition to establishing PFC as the minimum riparian goal, the RMP identifies that the BLM will adhere to the Utah Rangeland Health Standards under all alternatives. The BLM considered the information provided by WUP and believes that the combination of monitoring and management measures outlined in the RMP sufficiently meet the goals identified for riparian resources.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW48 (NRW10)	We recommend that cheatgrass and Russian olive be added to the noxious plant list in the RMP.	Cheatgrass and Russian olive are included in Table 3.16.6 (Noxious Weeds Undesired Plant Species) as well as in Section 3.1.6.2 (Undesired Plant Species) of the PRMP/FEIS.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW49 (NRW11)	We recommend that one of the key parts in the definition of range condition reflect forage plant productivity, measured as a percent of its potential.	Range condition definitions and explanations of the standards for rangeland health are included in Appendix F of the PRMP/FEIS.	
Wilderness Society, Wild	O-46	RW50	We recommend producing a map of riparian and wetland areas of the planning area that shows which	Figure 5 displays the coverage of the riparian and wetland inventory data within the VPA. Section	

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Utah Project, Center for Native Ecosystems		(NRW12)	streams have been inventoried and, of those inventoried, which are either PFC, FAR or NF.	3.11.2 discusses the number of acres and miles of riparian in Properly Functioning Condition (PFC), Functioning at Risk (FAR), or Not Functioning (NF). As discussed in Section 3.11.2, the preliminary inventory of wetland and riparian areas could once the comprehensive inventory has been conducted. Thus, producing a map of riparian and wetland areas and their conditions based on the preliminary inventory would not be useful.	
Wilderness Society, Wild Utah Project, Center for Native Ecosystems	O-46	RW51 (NRW13)	A map showing those steams that are in properly functioning condition, functioning at risk or non-functioning should also be prepared and included in the EIS. Such a map should correlate PFC rating for streams with allotments boundaries.	See comment response RW50. Also see Appendix L Grazing Allotment Table, which lists Rangeland Problems/Conflicts by allotment.	